

# FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY SURVEILLANCE EVALUATION REPORT

*Indiana Department of Natural Resources,  
Division of Forestry, Classified Forest & Wildlands Program*  
Indiana, USA

**SCS-FM/COC-000123N**  
**402 West Washington Street, Room W296**  
**Indianapolis, Indiana, 46204**  
**Brenda Huter, BHuter@dnr.IN.gov**  
<http://www.in.gov/dnr/forestry/4801.htm>

CERTIFIED	EXPIRATION
15 March 2015	14 March 2020

DATE OF FIELD AUDIT
26 Oct 2015
DATE OF LAST UPDATE
07 December 2015

*SCS Contact:*  
**Brendan Grady** | Director  
Forest Management Certification  
+1.510.452.8000  
[bgrady@scsglobalservices.com](mailto:bgrady@scsglobalservices.com)

**SCS**global  
SERVICES  
*Setting the standard for sustainability™*

## Foreword

Cycle in annual surveillance audits			
<input checked="" type="checkbox"/> 1 <sup>st</sup> annual audit	<input type="checkbox"/> 2 <sup>nd</sup> annual audit	<input type="checkbox"/> 3 <sup>rd</sup> annual audit	<input type="checkbox"/> 4 <sup>th</sup> annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Indiana Department of Natural Resources, Division of Forestry, Classified Forest & Wildlands Program (DNR)			

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

Pursuant to FSC and SCS guidelines, annual / surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

### Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

## Table of Contents

---

SECTION A – PUBLIC SUMMARY .....	4
1. GENERAL INFORMATION .....	4
1.1 Annual Audit Team.....	4
1.2 Total Time Spent on Evaluation .....	4
1.3 Standards Employed .....	4
2 ANNUAL AUDIT DATES AND ACTIVITIES .....	4
2.1 Annual Audit Itinerary and Activities.....	4
2.2 Evaluation of Management Systems .....	4
3. CHANGES IN MANAGEMENT PRACTICES.....	9
4. RESULTS OF THE EVALUATION.....	12
4.1 Existing Corrective Action Requests and Observations .....	12
4.2 New Corrective Action Requests and Observations .....	26
5. STAKEHOLDER COMMENTS .....	29
5.1 Stakeholder Groups Consulted .....	29
5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable .....	30
6. CERTIFICATION DECISION .....	30
7. CHANGES IN CERTIFICATION SCOPE .....	31
8. ANNUAL DATA UPDATE .....	35
8.1 Social Information.....	35
8.2 Annual Summary of Pesticide and Other Chemical Use.....	35
SECTION B – APPENDICES (CONFIDENTIAL).....	38
Appendix 1 – List of FMUs Selected For Evaluation.....	38
Appendix 2 – List of Stakeholders Consulted.....	38
Appendix 3 – Additional Audit Techniques Employed.....	38
Appendix 4 – Pesticide Derogations .....	39
Appendix 5 – Detailed Observations.....	39
Appendix 6 – Chain of Custody Indicators for FMEs.....	69
Appendix 7 – Group Management Program Members .....	74

## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Annual Audit Team

<b>Auditor Name:</b>	Paul E. Pingrey	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b>	Paul Pingrey began as an independent auditor for SCS Global Services in 2010. He is an ISO19011 accredited lead auditor for Chain of Custody reviews and forest management reviews. He worked for the Wisconsin Department of Natural Resources for over 35 years, including state and private forest management, state forest tax law supervisor and administration of state forest certification programs. He received a forestry degree from Iowa State University in 1974 and USFS Silviculturist Certification in 1988. Paul has served as the lead FSC Forest Management Auditor in past reviews for Minnesota DNR, Pennsylvania DCNR, Indiana DNR, Menominee Tribal Enterprises (Wisconsin), Johnson Forestry (South Carolina), and the Greenwood Tree Farm Fund (Oregon).		

#### 1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	1
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
<b>D. Total number of person days used in evaluation:</b>	<b>7</b>

#### 1.3 Standards Employed

##### 1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1-0	July, 2010
FSC Standard for Group Entities, 30-005	1-0	August, 2009
All standards employed are available on the websites of FSC International ( <a href="http://www.fsc.org">www.fsc.org</a> ), the FSC-US ( <a href="http://www.fscus.org">www.fscus.org</a> ) or the SCS Standards page ( <a href="http://www.scsglobalservices.com/certification-standards-and-program-documents">www.scsglobalservices.com/certification-standards-and-program-documents</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.SCSglobalServices.com">www.SCSglobalServices.com</a> ).		

### 2 Annual Audit Dates and Activities

#### 2.1 Annual Audit Itinerary and Activities

Date	Activity
<b>Thursday Oct 22</b>	
8-9 am	Opening Meeting French Lick
9 am – 4:30 pm	District 7 field sites in Orange County
<b>Friday Oct 23</b>	

8 am – 4:30 pm	District 11 field sites (Dubois and Martin Co. – see below)
<b>Saturday Oct 24</b>	
8 am – 4:30 pm	District 16 field sites (Pike Co. – see below)
<b>Sunday Oct 25</b>	Day Off
<b>Monday Oct 26</b>	
8 am – 3 pm	District 9 & 10 field sites (Spencer, Perry and Harrison Co. – see below)
3 pm	Closing Meeting

**Indiana Classified Forests 2015 Site Notes**

**Orange County Stop 1.** This 75 acre tract of sawtimber hardwoods was originally enrolled in the Classified Forest program by a forest industry manufacturer that later decided to divest its land holdings. The parcel was sold by auction in 2009 to a farmer who conducted a harvest during the winter of 2014-15. Ash salvage and crop tree spacing improvement were the objectives. Horses were used to skid the logs out of the woods, resulting in minimal site disturbance. The residual stand is dominated by white oaks. A moist valley includes hard maples, which are managed as a sugar bush.

**Orange County Stop 2.** A hardwood shelterwood harvest was completed during summer 2015. Mature oaks and other trees were selected for harvest by a qualified private consulting forester, who sold the timber by bids and administered the sale. A gas company with a pipeline through the property was notified in advance of the harvest, and they inspected the proposed job for risks. Auditor observed a careful logging job and placement of water diversions on skid trails to prevent erosion. The district forester notified the landowner that some tree tops that had fallen into an intermittent stream channel must be pulled back. The district forester is also encouraging the landowner to invest some of the harvest proceeds in Timber Stand Improvement to improve spacing near future crop trees. Forester pointed out that the landowner has a personal pet cemetery in the woods, which had been buffered during the harvest.

**Orange County Stop 3.** A forest industry manufacturer established a walnut plantation in about 1975 on bottomland adjacent to the Patoka River. A historic iron-truss bridge spans the river. Forty-nine acres of the plantation were auctioned in 2009 to a private landowner who is now doing non-commercial thinning, pruning and grape vine control. The walnut trees appear to be doing well, with about eight-inch average diameters. The landowner does the improvement work himself with advice from the district forester. The owner works without receiving any cost-sharing assistance.

**Orange County Stop 4.** A 100 acre parcel with a couple historic/cultural sites including an old one-room school foundation and a flagstone foundation from an 1800s general store adjacent to a spring. The woods appears to have been burned for pasture decades ago and was likely cut heavily during the farming era. The district forester marked TSI trees to cut or girdle on 60 acres. The property owners, a couple in their 70s, do the work themselves and have received EQIP cost sharing assistance. They have a system of walking trails to access the land.

**Orange County Stop 5.** A 125 acre Classified Forest parcel where about 40 acres have been marked for a harvest by a consulting forester. A total of 235 trees with an estimated volume of 75,000 bf have been sold but not yet cut. The selection includes a few veneer quality oaks, but the volume is mostly ash and beech. Auditor observed a well-spaced selection of future crop trees will remain. The rocky, sloping hillside includes an old rock quarry and deep ravines. Three, small 2-4 acre fields on the property had been planted with hardwood seedlings in 2011.

**Orange County Stop 6.** A 21 acre tract was logged last year by a landowner, removing poor quality ash and hardwood saw logs from what was likely once a wooded pasture. A stone ford was used to cross an intermittent creek. The landowner has followed up the harvest by cutting beech and other less desirable sapling/pole trees. The residual stand will be mostly yellow poplar and some oaks.



**Orange County Stop 7.** Active logging job on 39 acres. The current owner purchased the land a year ago for deer hunting. He has hired a sawyer and log skidder who are cutting groups of trees to make early successional deer habitat. Logs are being yarded in a neighbor's field. Logger was not present, but auditor looked over the skidder and log truck and did not observe any noticeable oil leaks.

**Orange County Stop 8.** Current owner's parents had planted about 100 acres of old fields to a mix of oaks, walnuts and other hardwoods about 20 years ago. Spacing was relatively tight at about 4-5 feet to foster height growth. CRP cost-sharing was used. The young trees are now about 5-6 inches diameter in many places. The owner is thinning them to improve spacing for crop trees. The property was recognized as an Outstanding Tree Farm in 2007.

**Dubois County Stop 1.** A 27 acre harvest of 308 oaks and other mature hardwoods, removing approximately 71,000 board feet of timber in an intermediate thinning. The harvest was active at the time of the site visit. Auditor walked the harvest area with the landowner and his consulting forester, who was filling in a sale inspection report form. The terrain is relatively steep, and the loggers took care at the end of each day to install water diversions on the skid trails to prevent erosion should it rain. Auditor observed the sawyer's skill in directional felling of large trees without damage to residual growing stock. The sawyer was wearing eye, ear and head protection. He worked effectively with a grapple skidder operator who would lift downed trees 3-4 feet off the ground so the sawyer could safely trim limbs without the risk of rolling or springing of the main bole. The skidder operator was adept at maneuvering the full-length logs out of the woods without skinning up trees. The consulting forester who set up the harvest had done a fine job anticipating where the marked trees would fall and selecting additional trees for cutting where necessary for a safe drop. The RMZ of an intermittent stream was buffered. At the log landing, the company scaler explained how he designated the logs to be bucked for length, maximizing sawtimber and veneer value.



Figure 1. Dubois County Stop 1 Veneer Logs.

**Dubois County Stop 2.** A harvest of mature timber from three farm woodlots had been completed about a year ago. A qualified consulting forester had marked the timber, sold it on bids and administered the harvest. The woods had apparently been a pasture when the farm was active, and the objective of the harvest was to utilize older, often injured trees to make way for newer growth. 1,063 trees with about 161 Mbf had been cut according to volume information reported by the landowner. Skid trails had been properly closed out with water diversions. Auditor interviewed the consulting forester, who said that he has provided a bid to the landowner for follow-up crop tree release, vine removal and invasive species control.

**Martin County Stop 1.** A landowner had dedicated this 70-acre forest parcel to the memory of his brother, a fallen U.S. Marine. The landowner has done extensive improvement work thinning trees, cutting vines, controlling invasive plants, planting wildlife food plots, developing a wildlife watering hole, maintaining an excellent trail system, etc. The owner had withdrawn 3.3 acres from the Classified Forest program for a small recreational cabin because structures are not permitted on enrolled land. The cabin site includes a memorial monument to the brother.

**Martin County Stop 2.** The site visit reviewed marked and sold but un-cut mature oaks and other hardwoods. The landowner and the consulting forester had provided DNR with a pre-sale notice, and an appropriate pre-harvest assessment with the timber buyer has occurred. The auditor reviewed the Forest Stewardship plan prepared by a different consultant (not the one helping with the harvest) and found that the harvest is consistent with the plan. The prescription is sound based on the condition of the woods and presence of hardwood regeneration and remaining crop trees. Auditor notes the exceptional site quality based on the number of high veneer-quality, tall trees on the site (both marked and reserved growing stock).

**Pike County Stop 1.** The audit team met with the owner of a 200 acre tract that is being restored to forest cover after strip mining for coal during the 1930s. The practice at that time was to pile the topsoil and overburden in long, parallel ridges about 20-30 high to get at the coal. Since there were minimal requirements then to remediate to land, the coal company essentially walked away and let nature take its course. During the past ten years, the current owner worked extensively to develop a system of access trails, spray FSC-compliant herbicides to control invasive/undesirable vegetation, girdle weed trees, and hand plant about 20,000 hardwood trees. Tree planting, invasive species control and TSI were done with assistance from EQIP cost sharing. The landowner keeps meticulous records of time and expenses, and the federal NRCS regularly audits the implemented practices. The landowner organized high school Future Farmers of America students who planted the trees by hand.

During the past year, the landowner gave permission to the federal EPA to install three acid ground water mitigation projects. The work involved leveling some of the spoils ridges to cover pyrite containing clays that contribute to acidic runoff. Leveled lands were recently seeded to a mixture of grass and herbaceous ground cover. As an experiment, the seed mix includes black locust and sassafras tree seed, which the landowner hopes will form a thicket to prevent deer browsing on 800 hardwood seedlings per acre that he intends to machine plant in spring 2016.

The landowner expressed frustration about deer damage to his planted tree seedlings. He leases the land to a hunting club that earnestly shoots all the deer they can during hunting season, but there are still high deer numbers. The landowner has requested an off-season nuisance deer control permit, which has so far been denied by the DNR Wildlife Division.

**Pike County Stop 2.** An active timber harvest purchased by a member of the Indiana FSC COC Group. Audit team met with the timber producer and watched as trees were de-limbed at the yard, sorted for quality, and chipped as pulpwood if the quality was not sufficient for better use. Chips from Classified Forest tracts are sold with an FSC 100% claim to a Domtar paper mill in Kentucky. During the interview, the logger explained that he has spill kits available in the trucks should a hydraulic line break or fuel be

spilled. He described precautions the logging crew takes to avoid wet-weather damage to soils and roads.

Regarding the Classified Forest tract, the DNR District Forester pointed out an error she had discovered in the enrolled property boundary map, which included a small area of ineligible cropland. She described the steps she would take to rectify the situation.

**Pike County Stop 3.** Audit team met with a landowner and his young son, who had been hunting on the land earlier in the day. Last winter, the landowner had directed the harvest (consistent with the forestry plan) of 134 scattered mature sycamore trees from the 56 acre lowland tract. He described advice he had received from the district forester to smooth ruts, cut vines, plant hardwoods and release crop trees. He had completed all the prescribed practices and intends to do more.

**Pike County Stop 4.** A 30-acre tract that had received a straightforward intermediate harvest of mature oaks and other hardwoods as prescribed in the plan. The audit team met with the consulting forester who had set up and administered the sale. We walked the property with the consultant who pointed out where a stream crossing had been located. The crossing was difficult to find since there were few impacts. The DNR district forester said that he had also inspected the stream crossing when the sale was active and was satisfied with the approach and trail closeout. The RMZ was buffered. Overall, the auditor observed that a careful harvest had been conducted with no damage to reserve trees. Snags and den trees were reserved for wildlife. The consultant expressed disappointment that this particular owner had not reinvested any of the sale revenue in timber stand improvement, but the growing stock is in generally good condition.

**Spencer County Stop 1.** Site listed in the DNR Natural Heritage database as a high-quality, dry flatwoods community. The 60 acre tract has a low wetland in the middle third, with the remaining uplands about 10 feet higher. The land has been in the ownership of the same family for over a century and was one of the first Classified Forest enrollments in 1924. Six rare, threatened or endangered plants have been located on or near the property. The audit team observed a forest mix of post oak, white oak, hickory, cherry and other hardwoods. The absence of tree stumps and records indicate the timber has not been harvested for about 110 years. The forest management plan allows for a harvest if desired by the landowner, but the district forester indicates that state conservancy programs might intercede if it comes to that. The site is included in the Classified Forest HCVF plan.

**Perry County Stop 1.** A church-owned 160-acre block, including 133 acres designated for a selection timber harvest. A consulting forester marked and sold 428 Mbf of hardwood timber, which is about half cut. The timber producer pulled out after spring rains made the soils muddy, but he will likely finish this coming winter. The district forester prefers having data on which to base a prescription, and so he collected inventory plots when he updated the forest management plan in 2013. The harvest is consistent with the plan. A Feb. 2015 sale inspection report shows the forester directed the logger to stay off old roads that were badly rutted “hog troughs” from past cutting. The new skid trails were closed with water bars before the operator exited. Forester pointed out a rock shelter under an overhanging cliff, which might have cultural significance, although not listed in any database. That area was buffered from cutting.

**Perry County Stop 2.** A 79 acre tract of hardwood purchased from a forestry industry land auction in 2009. The district forester showed the auditor all the previous annual reports from the landowner that showed no intent to cut timber. Last year, however, the owner allowed a logger onto the property without notifying DNR first. The logger completed a non-authorized diameter limit cut, removing all the merchantable trees and leaving little other than pole-sized yellow poplars. Steep skid trails were not properly closed out and eroded into gullies. The district forester sent the landowner a notice of non-compliance on September 24, 2015. It includes a mandatory Corrective Action Request to fix the skid trails to stop the erosion (involuntary withdrawal will result if the owner does not take corrective action). In addition to entering the CAR in the tract database, the district forester notified DNR staff in



adjoining counties to watch out for this landowner, who has other property. Forester anticipates the site will regenerate naturally to oaks and other hardwoods.

**Harrison County Stop 1.** A 31 acre recreational tract along the Blue River. The landowner purchased the property in 2011 from someone who had done liquidation cut. They are now following a Stewardship Plan to rehabilitate the woods. They've developed an excellent trail system and have completed beech weed-tree, vine and invasive species removal. A unique deer hunting stand complete with a spiral staircase occupies the site.

**Harrison County Stop 2.** A 62 acre oak hardwood stand held by the current owner for 40 years. During that time he's had four intermediate timber harvests: 1980 (32 Mbf), 1984 (30 Mbf), 1990 (66 Mbf) and 2014 (243 Mbf). Each harvest included patch openings, which have regenerated well with young oaks cherry and other hardwoods. The owner regularly releases crop trees and has inter-planted black walnuts and oaks where he was not satisfied with natural regeneration. He showed the auditor areas where he has sprayed invasive stilt grass and cut *Ailanthus* spp. A couple dug ponds provide wildlife water. The entire parcel is accessible from a network of mowed trails. The owner's family enjoys hunting on the land. He expressed appreciation for the district forester's guidance and keeps excellent records of all management activities.

## 2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

## 3. Changes in Management Practices

---

Excerpts from DNR Strategic Plan Overview:

Program was authorized March 10, 1921.

Purpose: To encourage timber production, wildlife habitat, and protect water quality on private lands.

Landowner incentive: Property tax reduction (Assessed value for enrolled land = \$1/acre)

Current enrollment (2015): 761,161 Acres; 15,406 tracts

Current Annual Budget: Total: \$2.09 million (of which salaries are \$1,860,780)

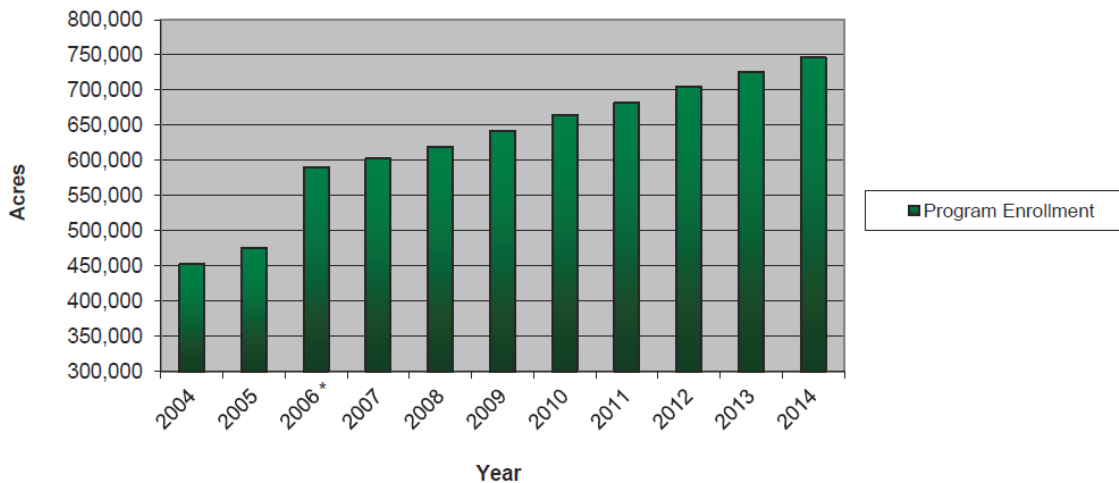
### 2014 Annual Accomplishments:

# CFM: What We Do

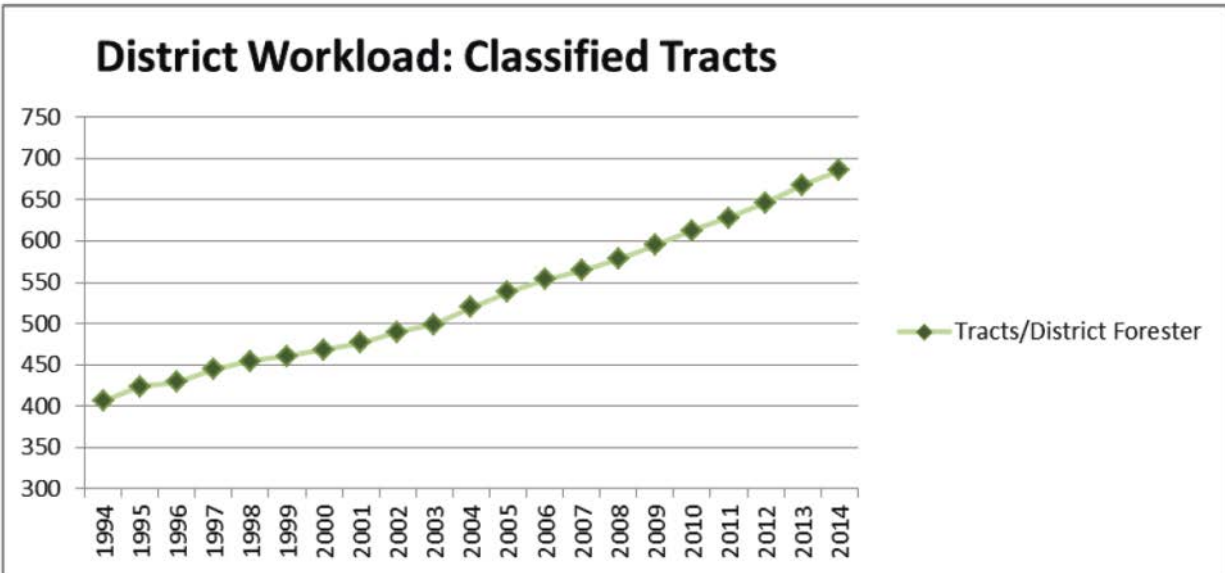
- Meet with landowners, walk their property, and discuss management options (1,179 new + 1,839 repeat clients; 163,590 acres)
- Write plans (stewardship plans: 3,020; practice plans: 476)
- Educational programing (241 programs, 13,588 attendees)
- Cost share - \$\$ for management
- Refer landowners to private foresters (1,534 referrals)
- Manage the Classified Forest & Wildlands Program (20,209 acres in 387 tracts enrolled; 68 withdrawals; 2,298 reinspections, 129 revised applications, 424 certified timber harvest reviews)



**PROGRAM ENROLLMENT**  
**Classified Forest Program 2004-2005**  
**Classified Forest & Wildlands Program 2006 - Present**



\* Classified Forest Program & Classified Wildlife Habitat Program merged to create Classified Forest & Wildlands Program



In order to support growing workload including re-inspecting all tracts on a 5-7 year cycle, the 2015 Strategic Plan proposes fee increases as shown in the following table. The Indiana Natural Resources Commission will determine if the changes are authorized later in 2015 after DNR responds to stakeholder input.

## CFM: Fee Proposal

### Classified Forest & Wildlands Program

- ❑ Annual administration fee of \$2/acre
- ❑ Current minimum tax saving is \$4/acre for enrolled land
- ❑ All other services free for classified landowners
- ❑ Fee collected by county for a percentage (10%)
- ❑ Estimated revenue \$1.3 mil for Division of Forestry

## 4. Results of the Evaluation

### 4.1 Existing Corrective Action Requests and Observations

#### 2014 Indiana Classified Forests CARs/OBS

<b>Finding Number: 2014.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US Forest Management Standard, 6.1.b.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b>	
<p>In a significant number of instances (for some districts approximately 50% of the time), DNR is not being notified until after harvests are completed. As a result, pre-harvest inspections required by the Group's forest management and COC procedures that are intended to identify impacts and appropriate BMP measures, precautions for RTE species, affirmation of eligible FSC claims and codes, etc. are not occurring.</p>	
<b>Corrective Action Request (or Observation):</b>	
<p>FME shall develop and implement procedures to ensure that prior to commencing timber harvests that will be marketed as FSC certified (regardless of whether the timber is ultimately sold with an FSC claim), on-site inspections occur to assess the potential short and long-term impacts of planned management activities.</p>	
<b>FME response (including any evidence submitted)</b>	<p>The Division of Forestry has implemented a certification training program for professional foresters and industry. The training reviews Indiana Classified Forest Certified Group policies such as management plans, legacy trees, wildlife trees, BMPs, rutting guidelines, chemical use, shares sales, reporting and conducting a pre-harvest conference. After attending the training, participants can conduct their own pre-harvest conferences and send the appropriate documents to the district forester. The first training was held on March 24, 2015 and had 32 participants. Another training is scheduled for December 9, 2015.</p> <p>In addition education of landowners about contacting their district forester before a harvest continues through the annual report.</p>
<b>SCS review</b>	<p>To ensure the use of pre-harvest assessments, DNR now authorizes trained consulting foresters to complete the reviews in addition to DNR staff. The policy change significantly increases availability of trained foresters that can guide landowners. The first training session was completed in March 2015. Interviewed consulting foresters at site visits were knowledgeable and comfortable with the role. All the visited timber harvests in 2015 that were marketed as certified (based on consultant bid forms) had received pre-harvest reviews. Note that the training is voluntary and simply allows consulting foresters to offer additional services to clients in Indiana while allowing DNR to meet the requirements of this finding and several others.</p>

<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
-----------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Finding Number: 2014.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US Forest Management Standard Indicator 6.3.f.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b>	
<p>DoF has developed a new procedure to facilitate conformance with Indicator 6.3.f. However, the forest workers involved in tree marking have not been made aware of the new procedure. Furthermore, the audit team notes a possible interpretation error in the part of the procedure related to protecting cull trees that have good wildlife values. The procedure states “culls not salvaged should be left standing,” thus allowing loggers to possibly salvage all cull trees. The guidance as written appears to be directed at TSI crews rather than directing the guidance at the initial timber marker who has the opportunity to change a cull designation of “x” (signifying optional felling) to a “W” or “TSI” that removes a loggers discretion to fell all cull trees.</p>	
<b>Corrective Action Request (or Observation):</b>	
DoF must clarify the cull tree marking procedure and ensure that professional foresters and loggers (who do all of the marking of CF) are trained in the new Wildlife and Legacy Tree procedure.	
<b>FME response (including any evidence submitted)</b>	<p>The Division of Forestry has implemented a certification training program for professional foresters and industry. The first training was held on March 24, 2015 and had 32 participants. The training reviews Indiana Classified Forest Certified Group policies including snag retention. At the first training, a discussion was held about the intent of the Snag and Cull portion of the Legacy and Wildlife Tree policy and that they should expect an update to the policy by the end of the year. The policy update has been distributed via e-mail to district foresters and attendees of the spring training via e-mail. Another certification training for industry is scheduled for December 9, 2015 and this topic will be covered. Landowners will be informed in the 2016 Classified Forest &amp; Wildlands Newsletter.</p> <p><i>Legacy and Wildlife Trees</i></p> <p>In order to keep and develop wildlife habitat and stand structures that would develop from natural forest processes, the following types of trees and structures should be retained:</p> <ul style="list-style-type: none"> <li>• Legacy trees: Individual old trees that function as a refuge or provides important structural habitat values. “Wolf” trees at home sites, along abandoned road beds, etc. are recommended for retention.</li> <li>• Large live trees: The goal is to retain at least 3 live trees greater than 19 inches dbh per acre.</li> <li>• Snags &amp; Culls: : The goal is to retain/create at least 4 snags greater than 5</li> </ul>

	<p>inches per acre with an optimum target of 7 snags greater than 5 inches dbh per acre. Standing snags and culls not salvaged should be left standing, except where they pose a human safety hazard. Cull trees may be deadened (girdle, herbicide) when necessary to achieve a silvicultural goal, but should be left standing. A tree with less than 10% live canopy should be considered a snag. Snags that have no remaining bark or no visible cracks, splits, or hollows may be felled as well as any snags leaning more than 45degrees from vertical.</p> <p>Legacy trees should be generally representative of the species mixture on the site.</p>
<b>SCS review</b>	<p>DNR updated the cull tree marking procedure and have provided relevant training to DNR and consulting foresters. The first training session occurred in March 2015 and more are scheduled. DNR also provided a copy of an email sent to consulting foresters on Oct 21, 2015 the further clarifies the policy. During 2015 site visits, auditor observed appropriate retention of snags and culls.</p>
<b>Status of CAR:</b>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

<b>Finding Number: 2014.4</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<p><input type="checkbox"/> Pre-condition to certification</p> <p><input type="checkbox"/> 3 months from Issuance of Final Report</p> <p><input type="checkbox"/> Next audit (surveillance or re-evaluation)</p> <p><input checked="" type="checkbox"/> Other deadline (specify): none</p>
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 6.5.c
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b>	
<p>Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.</p>	
<b>Corrective Action Request (or Observation):</b>	
<p>DoF should consider implementing a revised rutting guideline that better protects soil and water resources.</p>	
<b>FME response (including any evidence submitted)</b>	<p>The Division of Forestry is working a revised rutting guideline. The guideline has been drafted and is under review. The guideline has been presented to district foresters for comment. The target for finalizing the guidelines is November 15, 2015. See rutting draft document.</p>
<b>SCS review</b>	<p>DNR initiated a process to strengthen soil compaction and rutting guidelines, which are still in draft form. No related training has occurred. The Observation shall be carried over to track continuing progress.</p>



<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i>
-----------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Finding Number: 2014.5</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US Forest Management Standard Indicator 6.6.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The annual report from landowners indicated that some in the certified group used prohibited chemicals within the last year on their individual properties (2,4-D, 2-ethylhexyl ester and dicamba).	
<b>Corrective Action Request</b> (or Observation): DoF shall take actions to ensure that no chemicals on the FSC Highly Hazardous Pesticide list are used by any certified group members without a valid derogation.	
<b>FME response</b> (including any evidence submitted)	<p>The Division of Forestry actions to prevent use of FSC Highly Hazardous Pesticides by Indiana:</p> <ul style="list-style-type: none"> <li>Address pesticide use in the group umbrella plan:</li> </ul> <p><b>Pesticide Use</b></p> <p>Pesticide use is one tool available in IPM. In general non-chemical pest management which provides desired control and is cost effective is preferred. High hazardous pesticides, banned by FSC, are not to be used on ICFCG. The use of a banned pesticide will result in the issuance of a corrective action request and possible removal from the certified group. More information on banned pesticides is available from district foresters and on the Division of Forestry’s website (<a href="http://www.in.gov/dnr/forestry/">http://www.in.gov/dnr/forestry/</a>).</p> <p>All pesticides must be applied according to the label. Group members must keep records of pesticides applied to their certified forests. Landowner records should include the pesticide used, date, the reason for application, location of application, amount applied, and name of applicator. The group member must report pesticide use on their Classified Forest &amp; Wildlands Annual Report.</p> <p>The group manager will review pesticides reported on the annual reports and issue corrective actions as necessary.</p> <ul style="list-style-type: none"> <li>Group Member Education</li> </ul> <p>In the Classified Forest &amp; Wildlands Newsletter (annual) the issue of chemical use is discussed. See the attached example article. The spring 2015 newsletter will contain a reminder on chemical use. The newsletter goes to all group members</p> <p>For individuals who report using a banned chemical on their annual report, they</p>

	<p>are contacted by the district forester to determine if the chemical was used on their certified land. If the landowner did use the chemical and it is their first use, the district forester issues educational CAR (see attached samples). Repeat use of banned chemical will result in removal of the landowner from the certified group.</p> <ul style="list-style-type: none"> <li>• Industry Education: The Division of Forestry also works with members of the forestry industry to help prevent use of banned chemical on group lands. The State Forester attends and talks at industry meetings. We are hosting certification training for professional foresters at the end of March 2015. Pesticide use will be covered at that training.</li> </ul> <p><b>May 18<sup>th</sup> update:</b>  District Forester Training, Feb 26, 2015  Pesticide related slides from Training PowerPoint (FSC Highly Hazardous Chemicals Standard Updated. pptx)</p> <p>Classified Forest &amp; Wildlands Newsletter (ForCFWNewsletter2015_print.pdf): Hard copies mailed to landowners on March 24, 2015. See page 7 Green Certification Update. In a separate e-mail, you will receive a copy of the electronic newsletter for landowners who file their required reports using our online database.</p> <p>Industry Green Certification Training, March 24<sup>th</sup>, 31 attendees  Pesticide related slides from Training PowerPoint (FSC Highly Hazardous Chemicals Standard Updated. pptx)  Training Attendee List (Certified Industry Preharvest Training List.xlsx)</p>
<p><b>SCS review</b></p>	<p>SCS reviewed a number of documents pertinent to the points above. An agenda for the March 24<sup>th</sup> <u>CFW Industry Training Meeting</u> was reviewed and found to include information on pesticide use. The PowerPoint slides for the training were also reviewed and found to contain correct instructions and examples pertaining to the new HHP list. SCS also reviewed the draft text pertaining to pesticide use for the next issue of the Green Certification Update, the newsletter for the Classified Forest &amp; Wildlands Program, which is sent to all participating landowners. The text on pesticide use is accurate.</p> <p>Given that the information contained within all these draft documents is accurate and up to date, but the newsletter has not yet been sent out, and the training not yet given, this Major CAR is extended for one three month period, to be closed as soon as proof that the full corrective actions have been undertaken.</p> <p><b>May 20<sup>th</sup> update:</b>  The above mentioned documents have been reviewed and satisfy the requirements of this CAR.</p> <p>The training slides include mention of the new HHP list and how to check if a chemical is prohibited.</p> <p>SCS reviewed the eNewsletter for Classified Forest participants, which includes a</p>

	link to the recent Green Certification Update for certified members. A review of the update verifies that it includes an excellent description of the new HHP list and instructions on how to ensure members are not using prohibited chemicals.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.6</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 7.1.a viii
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Although there are notable exceptions, most DNR District Foresters do not stratify land cover types into separate stands in forestry plans or maps, nor do they collect any stand-level inventory data. Auditors also observed that few landowner files include maps that identify timber harvests or other active management areas such as TSI operations. Better forest management decisions would likely result from more stand-specific information in plans and maps, whether it be qualitative or measured/numeric.	
<b>Corrective Action Request</b> (or Observation): FME should encourage foresters to provide more stand-level cover type information in plans and maps. Harvests and other treatments should be identified on maps. Stand-level variables should be measured rather than relying so heavily on intuition or perceptions.	
<b>FME response</b> (including any evidence submitted)	DoF is considering how to incorporate more stand level data into plans for larger classified tracts with owners who have an interest in forest management. Some consultant foresters already provide sale maps, this could be expanded by working with industry that has participated in the certification training.
<b>SCS review</b>	Interviews with district foresters indicate that most Classified Forest parcels are relatively small and the tracts are treated as a block due to the continual selection marking technique commonly used in Indiana. As a result, stand maps and property boundary maps often coincide. Landowners with larger tracts typically hire a consulting forester to prepare forest management plans and harvests, and those consultant jobs generally have maps. Auditor interviews with landowners also indicate that many landowners keep detailed records including maps of practices they implement. Although stand-level maps and data could be improved, the current approach is sufficient for the scale and intensity of the Classified Forest program.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

**Finding Number: 2014.7**

<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC US Forest Management Standard FF Indicator 7.1.b.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Management actions recommended in the management plan are sometimes not executed by the landowner. For example, some district foresters often recommend using regeneration openings to encourage oak regeneration. However, very few landowners will implement regeneration openings on their forest. Lack of follow through on TSI recommendations is another example of management plan recommendations that are sometimes not implemented.	
<b>Corrective Action Request</b> (or Observation): DoF should consider taking additional actions to help ensure management recommendations are implemented.	
<b>FME response</b> (including any evidence submitted)	DoF continues to work with our federal partners to find funding to incentivize landowners to implement more management activities. For example, DoF just submitted a grant proposal to the Forest Service that would, if funded, provide payments to landowners to create openings/early successional habitat. DoF is also a partner on the Hoosier Hills & Highlands Joint Chief Grant Proposal that if funded will provide money through EQIP to fund control of invasives, planting of oaks, erosion control, riparian buffers, and pruning.
<b>SCS review</b>	The FSC indicator requires that, "Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan." During the 2015 site visits, nearly all the implemented practices observed by the auditor (harvests, TSI, invasive species control, etc.) were included in the forest management plans. In situations where the owner did something not in the plan (e.g., a diameter limit cut in Perry County), the owner had been sent a notice of nonconformity and corrective actions that are required.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.8</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC US Forest Management Standard 7.3.a.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations):	

<p>There is often very little interaction between District Foresters, loggers and consulting foresters regarding harvests or management planning on any given property. Other forest workers are rarely aware of the stewardship plans or the recommendations therein. This lack of coordination between all those working in the forest results in incomplete implementation of individual stewardship plans.</p>	
<p><b>Corrective Action Request (or Observation):</b> DoF should consider exploring ways to improve the coordination between all forest workers, to ensure that all workers are qualified to properly implement the management plan and are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	<p>The Division of Forestry has implemented a certification training program for professional foresters and industry. The training reviews Indiana Classified Forest Certified Group policies such as management plans, legacy trees, wildlife trees, BMPs, rutting guidelines, chemical use, shares sales, reporting and conducting a pre-harvest conference. The first training was held on March 24, 2015 and had 32 participants. Another training is scheduled for December 9, 2015.</p>
<p><b>SCS review</b></p>	<p>Revision of DNR’s pre-harvest assessment to authorize trained consulting foresters to conduct the reviews is improving information sharing. Interviews with consulting foresters and loggers during 2015 site visits indicated that they had received copies of the parcels’ plans.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

<p><b>Finding Number: 2014.9</b></p>	
<p><b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p>	
<p><b>FMU CAR/OBS issued to</b> (when more than one FMU):</p>	
<p><b>Deadline</b></p>	<p><input type="checkbox"/> Pre-condition to certification  <input type="checkbox"/> 3 months from Issuance of Final Report  <input type="checkbox"/> Next audit (surveillance or re-evaluation)  <input checked="" type="checkbox"/> Other deadline (specify): none</p>
<p><b>FSC Indicator:</b></p>	<p>FSC US Forest Management Standard 8.2.a.1</p>
<p><b>Non-Conformity (or Background/ Justification in the case of Observations):</b> DoF collects inventory data at the state level through the relatively newly begun system of CFI plots. These plots provide updated coarse grain inventory information that should allow trends to be tracked over time. However, very little property level inventory data is being collected – and on the smallest properties of only 10 ac, this level of data collection may not be useful or feasible. Inventory data is being collected however on larger properties, sometimes by the landowner, or with the assistance of a consulting forester. On larger properties, or those interested in conducting regular harvests, this inventory data could prove useful in management planning.</p>	
<p><b>Corrective Action Request (or Observation):</b> DoF should consider determining criteria for properties on which inventory data will be collected, including at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	

<b>FME response</b> <i>(including any evidence submitted)</i>	DoF is still considering this observation. Inventory on larger classified tracts with a landowner who has timber management as primary objective would be the top priority for inventory work. The challenge is finding the method to achieve this goal considering current funding and staff.
<b>SCS review</b>	Considering program staffing constraints, scale and intensity, and the availability of consulting foresters to landowners with timber management objectives, the auditor concludes that DNR's current approach to Classified Forest inventory complies with minimum FSC requirements, although is not ideal given the long-term goals of the program. The organization also expressed an intent to strengthen the inventory aspect of the program and is seeking fee increases through the strategic plan process that will help them accomplish more.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.10</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US Forest Management Standard Indicator 8.5.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Monitoring data related to "Volume and Growth of Classified Forest and Wildland Program Lands" was published on the Internet by Indiana Division of Forestry on October 8, 2008, but it hasn't been updated since. The most recent on-line program summary is dated 2008. BMP monitoring results have not been updated since 2011. No HCVF-related monitoring summaries were found for Classified Forests.	
<b>Corrective Action Request</b> (or Observation): FME shall provide updated, publically available monitoring results for the indicators in Criterion 8.2.	
<b>FME response</b> <i>(including any evidence submitted)</i>	A 2014 Program Summary has been developed and the request to have it posted to the DoF website has been made. Summary should be online by the end of October 2015. In regards to volume and growth data, <i>IN DNR Classified Forest Report of Continuous Forest Inventory (CFI) Summary of Years 2011-2014</i> is posted at <a href="http://www.in.gov/dnr/forestry/files/fo-Classified_Forests_CFI_Report_2011_2014.pdf">http://www.in.gov/dnr/forestry/files/fo-Classified_Forests_CFI_Report_2011_2014.pdf</a>
<b>SCS review</b>	As of Oct 29, 2015, the auditor observed that current volume, BMP compliance and other summary data for the Classified Forest program are available on the organization's website. Many useful updates were prepared in conjunction with the 2015 Forestry Strategic Plan.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)



<b>Finding Number: 2014.11</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US Forest Management Standard Indicator 9.1.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): In preparation for past audits, DoF has conducted components of their HCVF evaluation which has resulted in a general list of the HCVF categories determined to be present, a combined acreage of these areas, and a list of community types that could be designated as HCVF if found in the field. However, a full HCVF assessment has not yet been completed as described in Appendix F.	
<b>Corrective Action Request</b> (or Observation): DoF shall identify and map the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.	
<b>FME response</b> (including any evidence submitted)	DoF has identified HCVF within the Classified Forest Certified Group. Tracts that are part of a forest block (>740 acres) in an ag dominated landscape have been identified using GIS. Also tracts that contain S1 or S2 communities have been identified. The information has been captured in the Classified Forest & Wildlands online database in the tract record making the data available to foresters and landowners. DoF foresters continue looking for tracts that contain hemlock during field visits.
<b>SCS review</b>	Although DNR has the components of a Classified Forests HCVF assessment, they have not pulled them together into a report per FSC-US guidance. At a minimum, the assessment shall describe data considered, stakeholders consulted and conclusions regarding each HCV type. CAR is carried over and promoted to Major.
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.12</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	SCS FSC Chain of Custody Indicators for Forest Management Enterprises 2.2
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Each group member must report the volume of timber sold on an annual report. Of 249 tracts that were reported as having a timber harvest in 2013, only 81 tracts (33%) had records of board foot volume harvested.	

<p>Numerous site visits indicate that landowners often do not receive or report quantity of products sold. Interviews indicated that many loggers and some consulting foresters do not always provide species and volume information.</p>	
<p><b>Corrective Action Request (or Observation):</b> FME shall develop and implement procedures to define the forest gate and a material accounting system that includes the volume of FSC-certified products sold.</p>	
<p><b>FME response (including any evidence submitted)</b></p>	<p>DoF continues to educate ICFCG members (newsletter and CARs) and industry (certification training) regarding reporting of material sold on Classified Forest. On the 2014 Classified Forest annual report 67% of timber sale reports included volume harvested. For certified sales that were reported as sold FSC certified, 96% included the volume information – one sale included number of trees sold but did not include the volume.</p>
<p><b>SCS review</b></p>	<p>A change in procedures to involve consultants in pre-harvest reviews and the training and outreach conducted by DNR are resulting in improved timber harvest reporting.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

<p><b>Finding Number: 2014.13</b></p>	
<p>Select one: <input checked="" type="checkbox"/> Major CAR    <input type="checkbox"/> Minor CAR    <input type="checkbox"/> Observation</p>	
<p><b>FMU CAR/OBS issued to (when more than one FMU):</b></p>	
<p><b>Deadline</b></p>	<p><input checked="" type="checkbox"/> Pre-condition to re-certification  <input type="checkbox"/> 3 months from Issuance of Final Report  <input type="checkbox"/> Next audit (surveillance or re-evaluation)  <input type="checkbox"/> Other deadline (specify):</p>
<p><b>FSC Indicator:</b></p>	<p>SCS FSC Chain of Custody Indicators for Forest Management Enterprises 3.2</p>
<p><b>Non-Conformity (or Background/ Justification in the case of Observations):</b>                  The auditor ran a Google search to look for uses of the FSC trademarks (including the letters FSC and the words Forest Stewardship Council, as well as the graphic logos). The search found 230 web pages that use "Forest Stewardship Council". Google found 1,380 pages in the IN.GOV domain that use "FSC", but not all of those hits are in regard to forest certification.</p> <p>The Certification Coordinator provided one 2011 SCS authorization (email) for an <a href="#">Indiana Tree Project web page</a>, but the graphic logo used on the page was not the one approved by SCS and is non-conforming. The Coordinator had no other trademark use authorizations from SCS.</p> <p>The auditor sampled some of the other web pages using FSC trademarks but was unable to find any with an FSC license code or other elements of an FSC promotional panel. Additional potentially nonconforming trademark uses were observed.</p>	
<p><b>Corrective Action Request (or Observation):</b>                  The FME shall request authorization from SCS to use the FSC trademarks for promotional use, including the public Internet site and publications.</p>	
<p><b>FME response</b></p>	<p>The Division of Forestry has set up new accounts (Indiana Classified Certified</p>

<i>(including any evidence submitted)</i>	Group and DoF State Forest) in the SCS logo website and has submitted and received approvals for logo use on the Division of Forestry webpage and documents (see attached approval lists and screenshots of websites). The CoC group has also received logo approvals and updated their section of the website (see screenshot). The DoF is working with the Natural Resources Foundation to get the Indiana Tree Project website updated to include the approved logo. Logo approval will be an ongoing process for the website and document development.
<b>SCS review</b>	SCS has reviewed the evidence provided by the FME, including evidence of correspondence and approval for logo usage.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2014.14</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to re-certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	SCS FSC Chain of Custody Indicators for Forest Management Enterprises 4.1, 4.2
<b>Non-Conformity</b> <i>(or Background/ Justification in the case of Observations):</i> When landowners sell timber on shares, loggers and/or consultants are effectively serving as outsourcing contractors that cut and broker the timber and transport logs to concentration yards or to certified mills. There is no evidence that group member contracts with timber producers and/or consultants include provisions that address requirements of a COC control system.	
<b>Corrective Action Request</b> <i>(or Observation):</i> The FME shall identify loggers and consultants that agree to provide outsourcing services that are consistent with the group’s FSC COC requirements. Such a directory of loggers and consultants signing an FSC conformance agreement shall be provided to group members. If group members elect to work with an outsourcing contractor not listed in the directory, then the individual landowner shall be responsible for demonstrating that their agreement with the service provider includes all applicable FSC COC requirements.	
<b>FME response</b> <i>(including any evidence submitted)</i>	<p>To address this issue, the Division of Forestry has added the following language to the ICFCG Umbrella Plan:</p> <p>Timber from ICFCG lands sold on shares cannot be passed down the chain of custody unless the shares sale logger/consultant (outsourcing contractor) is FSC Chain of Custody certified.</p> <p>To make the new policy known, the following steps will be taken:</p> <ul style="list-style-type: none"> <li>• A notice will be place in the Timber Buyer’s Bulletin starting in March and running for several months. The Timber Buyers Bulletin goes to all timber buyers licensed in Indiana.</li> <li>• A notice will be included in the Classified Forest &amp; Wildlands newsletter</li> </ul>

	<p>(spring 2015).</p> <ul style="list-style-type: none"> <li>The information will be shared at the certification training for professional foresters in March 2015.</li> </ul> <p><b>May 18<sup>th</sup> update:</b>                  Classified Forest &amp; Wildlands Newsletter (ForCFWNewsletter2015_print.pdf):                  Hard copies mailed to landowners on March 24, 2015. See page 7 Green Certification Update.</p> <p>Industry Green Certification Training, March 24<sup>th</sup>, 31 attendees                  Shares sale related slide from Training PowerPoint (Shares Sales on ICFCG. pptx)                  Training Attendee List (Certified Industry Preharvest Training List.xlsx)</p> <p>Licensed Timber Buyer Bulletin (LTB) Announcement: The LTB is sent monthly to all licensed timber buyer in Indiana. An announcement regarding shared sales on certified Classified Forest has been included since March and will be continued to be included through August 2015. (LTB Shares Sales Blurb. pdf)</p>
<p><b>SCS review</b></p>	<p>To address this issue, SCS reviewed the notice to be placed in the Timber Buyer’s Bulletin, the same notice to be placed in the program newsletter, the slides mentioning the policy change and explaining it for the certification training, and the new language in the Umbrella Plan.</p> <p>Given that the newsletters haven’t gone out yet and the training has not yet taken place, this Major CAR is extended for one three month period, to be closed when evidence is submitted that prove the above actions have taken place.</p> <p><b>May 20<sup>th</sup> update:</b>                  SCS has reviewed the above listed documents sent on May 18<sup>th</sup> and finds they provide verification that the actions intended to address the Major CAR have been completed.</p>
<p><b>Status of CAR:</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Upgraded to Major  <input type="checkbox"/> Other decision (refer to description above)</p>

<p><b>Finding Number: 2014.15</b></p>	
<p><b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation</p>	
<p><b>FMU CAR/OBS issued to (when more than one FMU):</b></p>	
<p><b>Deadline</b></p>	<p><input type="checkbox"/> Pre-condition to certification  <input type="checkbox"/> 3 months from Issuance of Final Report  <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation)  <input type="checkbox"/> Other deadline (specify):</p>
<p><b>FSC Indicator:</b></p>	<p>FSC Standard for Group Entities, 1.4</p>

<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Conversations with District Foresters during the audit indicated that although FSC topics are covered at annual meetings and training is occasionally conducted to improve staff understanding of FSC concepts, additional training is likely needed for complicated topics on a semi-regular basis. Topics that auditors felt foresters could improve their understanding of included RSAs, HCVF, old growth and Chain of Custody.	
<b>Corrective Action Request (or Observation):</b> DoF shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	
<b>FME response (including any evidence submitted)</b>	<p><b>District Training Needs</b></p> <p>General –                      ICFCG Enforcement: withdrawals from groups, CAR – when, why, how to handle                      HCVF: types, how to identify, how HCVF identification changes management                      ICFCG policies: seeding, green tree retention, rutting guidelines, snag trees, legacy trees                      Pesticide Policy: change in banned pesticide – use of CAS #</p> <p>New staff-                      BMP training</p> <p><b>Training Activities/Communication Strategies</b></p> <p>February 2015 – Section Meeting – Indiana bat &amp; snag retention, Green Certification Decision Forms, HCVF, banned pesticides, audit review                      September 2015 – Section Meeting – Certification Review: RSA, Old Growth, HCFV, draft rutting guidelines, 2017 logger training requirements                      September 2015 – Best Management Practices Training – new foresters                      Winter 2015/16 Rutting Guideline Training                      Spring 2016 – Section Meeting – Corrective Actions: why, when &amp; how                      Other:                      Develop a certification calendar for 2016                      Include Certification reminders in CFM Updates                      Create standard CAR letters – timber harvest, pesticide use, etc.</p>
<b>SCS review</b>	DNR’s increased focus on FSC-related training is documented in publications, 2015 Strategic Plan material, and the agendas for completed and planned training events. District and consulting forester awareness of these issues was good during 2015 field interviews.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2014.16</b>
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
<b>FMU CAR/OBS issued to (when more than one FMU):</b>

<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC Standard for Group Entities, 3.1.v
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b>	
<p>The INFRMS database system has a method whereby District Foresters can add violations from a drop down list for particular properties when CARs are noted. However, knowledge and use of this component of CAR tracking is inconsistent among District Foresters and not all CARs are going into the database. Follow up on violations is also not consistent. Thus, while DoF has a process for issuing internal CARs, this process is inconsistently applied and followed through on.</p>	
<b>Corrective Action Request (or Observation):</b>	
<p>DoF should consider clarifying or providing additional training to District Foresters on the process expected to issue and fulfill any corrective action requests issued internally, including timelines and implications if any of the corrective actions are not complied with.</p>	
<b>FME response (including any evidence submitted)</b>	A CAR specific training is planned for the 2016 Spring Section meeting as well as the development of a certification calendar to help CFM staff remember to do checks for reports of pesticide use, timber harvests, etc.
<b>SCS review</b>	Training in respect to this observation is planned but not completed. During field interviews, one district forester pointed out that internal CARs can be entered in the tract record but not in the landowner record, making it difficult for foresters in other counties to learn if a landowner has been previously issued a CAR elsewhere for a nonconformity. DNR is considering changes in the landowner database to allow CAR tracking across properties. The OBS is to be carried over for tracking.
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)

## 4.2 New Corrective Action Requests and Observations

<b>Finding Number: 2015.1 (carry over of OBS 2014.4)</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US Forest Management Standard 6.5.c



<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.</p> <p>The Division of Forestry is working a revised rutting guideline. The guideline has been drafted and is under review. The guideline has been presented to district foresters for comment. The target for finalizing the guidelines is November 15, 2015. See rutting draft document.</p>	
<p><b>Corrective Action Request</b> (or Observation): DoF should follow-through implementing a revised rutting guideline that better protects soil and water resources.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	
<p><b>SCS review</b></p>	
<p><b>Status of CAR:</b></p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

<p><b>Finding Number: 2015.2</b></p>	
<p><b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b>      <input type="checkbox"/> <b>Minor CAR</b>      <input type="checkbox"/> <b>Observation</b></p>	
<p><b>FMU CAR/OBS issued to</b> (when more than one FMU):</p>	
<p><b>Deadline</b></p>	<p><input type="checkbox"/> Pre-condition to certification</p> <p><input checked="" type="checkbox"/> 3 months from Issuance of Final Report</p> <p><input type="checkbox"/> Next audit (surveillance or re-evaluation)</p> <p><input type="checkbox"/> Other deadline (specify):</p>
<p><b>FSC Indicator:</b></p>	<p>FSC US Forest Management Standard Indicator 6.6.a</p>
<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>The annual report from landowners indicated that one member in the certified group used prohibited chemicals within the last year on their individual property (diquat dibromide - CAS Registry Number 85-00-7; prohibited under FSC-GUI-30-001 V2-0 (2007) and FSC-STD-30-001a (2015) unless a derogation is granted). DNR district forester has interviewed the landowner and confirmed non-conforming use of a banned product, but DNR has not yet initiated an internal CAR per group procedures.</p>	
<p><b>Corrective Action Request</b> (or Observation):</p> <p>DNR shall take actions to ensure that no chemicals on the FSC Highly Hazardous Pesticide list are used by any certified group members without a valid derogation.</p>	
<p><b>FME response</b> (including any evidence submitted)</p>	
<p><b>SCS review</b></p>	

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
-----------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Finding Number: 2015.3 (upgraded Minor CAR 2014.11)</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC US Forest Management Standard Indicator 9.1.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): In preparation for past audits, DoF has conducted components of their HCVF evaluation which has resulted in a general list of the HCVF categories determined to be present, a combined acreage of these areas, and a list of community types that could be designated as HCVF if found in the field. However, a full HCVF assessment has not yet been completed as described in Appendix F. Although DNR has the components of a Classified Forests HCVF assessment, they have not pulled them together into a report per FSC-US guidance.	
<b>Corrective Action Request</b> (or Observation): DoF shall identify and map the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. At a minimum, the assessment shall describe data considered, stakeholders consulted and conclusions regarding each HCV type.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2015.4 (carry over of OBS 2014.16)</b>	
<b>Select one:</b> <input type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input checked="" type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC Standard for Group Entities, 3.1.v
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations):	

<p>From 2014.16: The INFRMS database system has a method whereby District Foresters can add violations from a drop down list for particular properties when CARs are noted. However, knowledge and use of this component of CAR tracking is inconsistent among District Foresters and not all CARs are going into the database. Follow up on violations is also not consistent. Thus, while DoF has a process for issuing internal CARs, this process is inconsistently applied and followed through on.</p> <p>2015 Update: Training in respect to this observation is planned but not completed. During field interviews, one district forester pointed out that internal CARs can be entered in the tract record but not in the landowner record, making it difficult for foresters in other counties to learn if a landowner has been previously issued a CAR elsewhere for a nonconformity. DNR is considering changes in the landowner database to allow CAR tracking across properties.</p>	
<p><b>Corrective Action Request (or Observation):</b> DoF should consider clarifying or providing additional training to District Foresters on the process expected to issue and fulfil any corrective action requests issued internally, including timelines and implications if any of the corrective actions are not complied with.</p>	
<p><b>FME response</b> <i>(including any evidence submitted)</i></p>	
<p><b>SCS review</b></p>	
<p><b>Status of CAR:</b></p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> <i>Other decision (refer to description above)</i></p>

## 5. Stakeholder Comments

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

### 5.1 Stakeholder Groups Consulted

FME Management and staff	Local and regionally-based environmental organizations and conservationists
--------------------------	-----------------------------------------------------------------------------

Consulting foresters	Forest industry groups and organizations
Contractors	Local, state, and federal regulatory agency personnel
Local and regionally-based social interest and civic organizations	Purchasers of logs harvested on FME forestlands

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

### 5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.	
Stakeholder comments	SCS Response
<b>Economic concerns</b>	
Considering the public benefits of wildlife habitat, clean water, etc. provided by my property, I do not consider the proposed Classified Forest \$2 annual acreage fee to be justified.	The state legislature authorized DNR to collect fees to recover cost of services, and DNR is following a strategic planning process to have fees approved or rejected by the Indiana Natural Resources Commission. The organization is conformant with FSC criterion 1.1.
<b>Social concerns</b>	
None received.	
<b>Environmental concerns</b>	
A landowner expressed frustration about deer damage to his planted tree seedlings. He leases the land to a hunting club that shoots all the deer they can during hunting season, but there are still high deer numbers. The landowner has requested an off-season nuisance deer control permit, which has so far been denied by the DNR Wildlife Division.	Noted by the auditor. Division of Forestry does not have jurisdiction over nuisance deer control permits.

## 6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
---------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------

recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	
<b>Comments:</b>	

## 7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in **yellow** in the tables below.

### Name and Contact Information

<b>Organization name</b>	Indiana DNR Division of Forestry		
<b>Contact person</b>	Brenda Huter		
<b>Address</b>	402 W. Washington St., Room W296, Indianapolis, IN 46204 USA	<b>Telephone</b>	317-232-0142
		<b>Fax</b>	317-233-3863
		<b>e-mail</b>	bhuter@dnr.in.gov
		<b>Website</b>	www.in.gov/dnr/forestry

### FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
<b>FSC salesperson</b>			
<b>Address</b>		<b>Telephone</b>	
		<b>Fax</b>	
		<b>e-mail</b>	
		<b>Website</b>	

### Scope of Certificate

<b>Certificate Type</b>	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input checked="" type="checkbox"/> Group	
<b>SLIMF (if applicable)</b>	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
	# Group Members (if applicable) 7,998 landowners	
<b>Number of FMU's in scope of certificate</b>	10,388 parcels	
<b>Geographic location of non-SLIMF FMU(s)</b>	Latitude: 39°46'02.12" N (Indianapolis) Longitude: 86°09'55.47" W (Indianapolis)	
<b>Forest zone</b>	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
<b>Total forest area in scope of certificate which is:</b>	<b>Units:</b> <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
privately managed	210,919ha (521,193ac)	
state managed	0	
community managed	0	

<b>Number of FMUs in scope that are:</b>			
less than 100 ha in area	10,226 parcels	100 - 1000 ha in area	162 parcels
1000 - 10 000 ha in area	0	more than 10 000 ha in area	0
<b>Total forest area in scope of certificate which is included in FMUs that:</b>			<b>Units:</b> <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area		185,109 ha (457,415 ac)	
are between 100 ha and 1000 ha in area		25,810 ha (63,778 ac)	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs			
<b>Division of FMUs into manageable units:</b>			
Most FMUs are small enough in size that individual properties are not further divided into management units – some larger properties have stands delineated, with varying management and harvests planned by stand type.			

### Production Forests

<b>Timber Forest Products</b>	<b>Units:</b> <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	210,919ha (521,193ac)
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	Approximately 210,919ha (521,193ac)
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	
Clearcut (clearcut size range )	
Shelterwood	
Other:	
Uneven-aged management	Approximately 90% of harvests are selection
Individual tree selection	
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Average annual cut of approximately 30 million board feet (Doyle)
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	

Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	
<b>Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</b>	
The DOF conducts an annual analysis of the most current 5 years of FIA data for the plots located on Classified Forest & Wildlands tracts. This analysis is supplemented with a Continuous Forest Inventory (CFI) being developed on ICFCG parcels, with similar protocols as those used for the state forest CFI program.	
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i></b>	
<p>American chestnut (<i>Castanea dentata</i>)                  White ash (<i>Fraxinus americana</i>)                  Green ash (<i>Fraxinus pennsylvanica</i>)                  Black ash (<i>Fraxinus nigra</i>)                  Blue ash (<i>Fraxinus quadrangulata</i>)                  American basswood (<i>Tilia americana</i>)                  American beech (<i>Fagus grandifolia</i>)                  Ohio Buckeye (<i>Aesculus glabra</i>)                  Butternut (<i>Juglans cinerea</i>)                  Black cherry (<i>Prunus serotina</i>)                  Kentucky coffeetree (<i>Gymnocladus dioica</i>)                  Eastern cottonwood (<i>Populus deltoides</i>)                  American elm (<i>Ulmus americana</i>)                  Red/Slippery elm (<i>Ulmus rubra</i>)                  Blackgum (<i>Nyssa sylvatica</i>)                  Sweetgum (<i>Liquidambar styraciflua</i>)                  Hackberry (<i>Celtis occidentalis</i>)                  Sugar (Hard) maple (<i>Acer saccharum</i>)                  Silver (Soft) maple (<i>Acer saccharinum</i>)                  Red (Soft) maple (<i>Acer rubrum</i>)                  Shagbark hickory (<i>Carya ovata</i>)                  Mockernut hickory (<i>Carya alba</i>)                  Bitternut hickory (<i>Carya cordiformis</i>)                  Pecan (<i>Carya illinoensis</i>)                  Black locust (<i>Robinia pseudoacacia</i>)                  Honey locust (<i>Gleditsia triacanthos</i>)                  White oak (<i>Quercus alba</i> and others)                  Red oak (<i>Quercus rubra</i> and others)                  Osage-Orange (<i>Maclura pomifera</i>)                  Sassafras (<i>Sassafras albidum</i>)                  American sycamore (<i>Platanus occidentalis</i>)                  Black walnut (<i>Juglans nigra</i>)                  Black willow (<i>Salix nigra</i>)                  Yellow-poplar (<i>Liriodendron tulipifera</i>)                  Persimmon (<i>Diospyros virginiana</i>)                  American Basswood (<i>Tilia Americana</i>)                  Eastern White pine (<i>Pinus strobus</i>)</p>	

**FSC Product Classification**

<b>Timber products</b>		
<b>Product Level 1</b>	<b>Product Level 2</b>	<b>Species</b>

W1 Rough Wood	W1.1 Roundwood	All
W1 Rough Wood	W1.2 Fuelwood	All
W3 Wood in chips or particles	W3.1	All
<b>Non-Timber Forest Products</b>		
<b>Product Level 1</b>	<b>Product Level 2</b>	<b>Product Level 3 and Species</b>

**Conservation Areas**

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	ha or ac 0 acres recorded; some lands, however, may informally be managed primarily for conservation values, but the majority of Classified Forests are available for harvest; within the overall program, Classified Wildlands are specifically managed for conservation values, but the FSC group certification applies specifically to Classified Forests
-------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**High Conservation Value Forest/ Areas**

**High Conservation Values present and respective areas:**  
ac

Units:  ha or  ac

	Code	HCV Type	Description & Location	Area
<input checked="" type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
<input checked="" type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	Large block forests in ag dominated landscapes	43,597 acres
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	S1, S2 communities across state	10,110 acres
<input type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		



<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
<b>Total Area of forest classified as 'High Conservation Value Forest/ Area'</b>				<b>53,707 acres</b>

**Areas Outside of the Scope of Certification (Partial Certification and Excision)**

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
<b>Explanation for exclusion of FMUs and/or excision:</b>	Participants in the Classified Forests and Wildlands Program have the option to opt out of the certified group. Some percentage of landowners have opted out of the certificate and are not included in this scope.	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	Those landowners who have opted out of the group may still conduct timber sales, but do not have access to the CoC information or certificate codes and cannot make certified sales. Sales and loads are never mixed between certified and non-certified landowners.	
<b>Description of FMUs excluded from or forested area excised from the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)</b>
Uncertified Classified Acres (nonforested acres, landowner declined certification or undecided)	Statewide	241,615

**8. Annual Data Update**

**8.1 Social Information**

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>		
# of male workers: 16 (state employees only)	# of female workers: 7 (State employees only)	
<b>Number of accidents in forest work since last audit</b>	<b>Serious: # 0</b>	<b>Fatal: # 0</b>

**8.2 Annual Summary of Pesticide and Other Chemical Use**

<input type="checkbox"/> FME does not use pesticides.
-------------------------------------------------------

Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Triplet	2,4-D, dicamba, R-2-(2-methyl 4-chlorophenoxy) proponic acid		19	Invasive species control, grape vine control
2,4-D	2,4-D		2,453 acres	Timber stand improvement, invasive species control, grape vine control
Clopyralid	Clopyralid		10 acres	
Crossbow	2,4-D; triclopyr		3,936 acres	Timber stand improvement, invasive species control, grape vine control
Bayer Advanced Lawn Weed and Crabgrass Killer	2,4-D, quindlorac, dicamba		1 acres	Invasive species control
Pathway	2,4-D , picloram		910 acres	Timber stand improvement, invasive species control, grape vine control
Milestone	aminopyralid		356 acres	Invasive species control
Banvel	dicamba		50 acres	Invasive species control
Diquat	diquat		3 acres	Invasive species control
Fusilade	fluazifop-P-butyl		70 acres	Invasive species control
Accord, Eliminator, Roundup, Rodeo, Big & Tuff	glyphosate		10,422 acres	Timber stand improvement, invasive species control, warm season grass planting, tree planting
Plateau	Imazapic		14 acres	Invasive species control
Habitat	imazapyr		25 acres	Timber stand

				improvement, invasive species control
Princep	simazine		6 acres	
Tordon	Picloram		5,613 acres	Timber stand improvement, invasive species control, grape vine control
Poast	sethoxydim		168 acres	Invasive species control
Oust	sulfometuron methyl		18 acres	Timber stand improvement, invasive species control, tree planting
Garlon, Element, Pathfinder, Bayer Brush Killer Plus	triclopyr		3,041 acres	Timber stand improvement, invasive species control, grape vine control
<p>Note: The Tordon-picloram products are identified as CAS 6753-47-5 and CAS 2545-60-0 formulations, not the banned version CAS 1918-02-1. Likewise, Fusilade uses fluazifop-P-butyl (CAS 79241-46-6) not the banned fluazifop-butyl (CAS 69806-50-4).</p> <p>One landowner reported using banned product diquat (CAS Registry Number 85-00-7). DNR district forester has interviewed the landowner and confirmed non-conforming use of a banned product, but DNR has not yet initiated an internal CAR per group procedures.</p>				

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – List of FMUs Selected For Evaluation

- FME consists of a single FMU  
 FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled is presented in the audit itinerary. Landowners’ names are omitted for confidentiality purposes. SCS samples the Indiana Classified group as a set of SLIMF RMUs, with each district representing one RMU with numerous SLIMF group members. Prior to the audit, a spreadsheet of all the member properties with recent management activity listed by district was provided to the auditor for initial sample selection. In addition to harvests, tracts were selected in each district to assess other activities such as invasive weed control, TSI, planting, and the presence of natural areas or other special features. In consultation with the district foresters, the lead auditor considered time and travel constraints, ease of access and stakeholder issues on a property by property basis. All properties are natural forest and all are SLIMF.

### Appendix 2 – List of Stakeholders Consulted

#### List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Brenda Huter	Stewardship Coordinator		Opening meeting, field audit
John Seifert	State Forester		Opening meeting, field audit
Zack Smith	Forest Programs Coordinator		Field audit
Janet Eger	District Forester	812 583-9383	Field audit
James Dye	District Forester	812 582-2619	Field audit
Gretchen Herbaugh	District Forester	812 631-9378	Field audit
Carl Hauser	District Forester	812 608-2147	Field audit
Abby Irwin	District Forester	812 972-2704	Field audit
Allie Cline	District Forester	812-294-4306	Field audit

#### List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Justin Herbaugh	Consulting Forester		Field Interview	No
Travis Cole	Group Member		Field	No
David Seng	Group Member		Field	No
Mark Luff	Group Member		Field	No
Tom Werner	Logger		Field Interview	No

Adam Tattersol	Logger		Field Interview	No
The Nature Conservancy			Email (no response)	
Indiana Forest Alliance			Email (no response)	
Indiana Forest & Woodland Owner Association			Email (no response)	
Indiana Association of Consulting Foresters			Email (no response)	
Ruffed Grouse Society			Email (no response)	
Indiana Hardwood Lumbermen’s Association			Email (no response)	

### Appendix 3 – Additional Audit Techniques Employed

None.

### Appendix 4 – Pesticide Derogations

<input checked="" type="checkbox"/> There are no active pesticide derogations for this FME.		
<b>Name of pesticide / herbicide (active ingredient)</b>		<b>Date derogation approved</b>
<b>Condition</b>	<b>Conformance (C / NC)</b>	<b>Evidence of progress</b>

### Appendix 5 – Detailed Observations

<b>Evaluation Year</b>	<b>FSC P&amp;C Reviewed</b>
2014	All – (Re)certification Evaluation
2015	This year’s assessment included the following FSC criteria and their associated indicators (most of these relate to open findings from the 2014 re-evaluation audit, plus P1): 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 6.1, 6.3, 6.5, 7.1, 7.3, 8.2, 8.3, 8.5, 9.1. Group Entity Criteria: C1 General Requirements, C2 Responsibilities, C3 Group entity’s procedures, C9 Sales of forest products and use of the FSC trademark
20XX	
20XX	
20XX	

**Annual audit indicator tracking sheet:**



2015\_IN\_Classified\_  
Forests\_FSC\_Criteria

*C= Conformance with Criterion or Indicator*  
*NC= Nonconformance with Criterion or Indicator*  
*NA = Not Applicable*

NE = Not Evaluated

**FSC Principles Checklist**

*FSC Forest Management Standard (v1.0)—United States*

REQUIREMENT	C/N/C	COMMENT/CAR
<p><b>Principle #1: Compliance with Laws and FSC Principles</b>  <b>Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b></p>		
<p><b>1.1 Forest management shall respect all national and local laws and administrative requirements.</b></p>	C	
<p><b>1.1.a Forest</b> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <b>administrative requirements</b> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <b>Certifying Body</b> (CB) during the annual audit.</p>	C	<p>The Indiana Classified Forest Certified Group (Indiana Department of Natural Resources – Division of Forestry) exhibits strong conformance with laws, rules, and regulations. There are no enforcement actions against the agency related to compliance with applicable federal, state, or local forestry and related environmental laws and regulations. As individual group management plans typically are prepared using DNR’s templates, FMPs and operations reviewed demonstrate overall compliance considering the size of the group.</p>
<p><b>1.1.b</b> To facilitate legal compliance, the <b>forest owner or manager</b> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	C	<p>Indiana DNR has an extensive set of internal administrative policies that assure compliance with laws. Training is provided to employees to make them aware of requirements. Notices and updates to policies are regularly distributed. Department legal staff advises the agency.</p> <p>Interviews with staff indicate that the <a href="#">Indiana State Code</a> is readily available via the Internet.</p> <p>Indiana Classified Forest Certified Group Umbrella Management Plan and sample timber sale contract language include sections on compliance with laws and regulations.</p>
<p><b>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b></p>	C	

<p><b>1.2.a</b> The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p> <p><b>FF Indicator: Low risk of negative social or environmental impact.</b></p>	<p>C</p>	<p>Group member payment of annual property taxes is the only fee required. As explained by DNR, the fee for Classified Forests is based on an assessed value of only \$1 per acre, with most participants paying only a minimum of \$5 per year. Non-payment has not been an issue.</p> <p>DNR is proposing a \$2/acre annual fee for Classified Forests in a 2015 Forestry Strategic Plan. The Indiana Natural Resources Commission will decide the fate of the proposal later next year.</p>
<p><b>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b></p>	<p>C</p>	
<p><b>1.3.a.</b> Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p> <p><b>FF Indicator: Low risk of negative social or environmental impact</b></p>	<p>C</p>	<p>In the United States, each state is responsible for regulating the commercial sale of this CITES-listed species. In the State of Indiana, there is one forest species covered under CITES, <i>Panax quinquefolius</i> or American ginseng. DNR provides <a href="#">a flyer on ginseng regulations</a>.</p> <p>International treaties are implemented through federal legislation such as the Lacey Act. DNR has internal procedures demonstrating conformance to this and other applicable treaties.</p>
<p><b>1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</b></p>	<p>C</p>	
<p><b>1.4.a.</b> Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	<p>C</p>	<p>The auditor found no evidence of any conflicts between Indiana laws and the FSC-US Forest Management Standard. DNR staff reported no known conflicts in the 2015 assessment.</p>
<p><b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	<p>C</p>	

<p><b>1.5.a.</b> The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <b>Forest Management Unit (FMU)</b>.</p>	<p>C</p>	<p>During 2015 site visits, the auditor observed CFP properties to be well gated and signed. CFP regulations require posting the corners of enrolled properties. During 5-year re-inspections, DF's take note of unauthorized activities and discuss ways to address the problem.</p>
<p><b>1.5.b.</b> If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>	<p>C</p>	<p>Most of the properties are posted, gated, and contain CFP signs. In some instances owners work with Conservation Officers. Some landowners use hidden cameras to monitor activity. District Foresters can assist group members with guidance if timber theft or illegal activities are noted.</p>
<p><b>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b></p>	<p>C</p>	
<p><b>1.6.a.</b> The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>	<p>C</p>	<p>The Classified Forest Umbrella plan includes a requirement that "Landowners are the group members and are responsible for implementing the FSC certification standards and policies on their classified forests." The 2015 Forestry Strategic Plan includes a commitment to FSC certification.</p>
<p><b>1.6.b.</b> If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>	<p>C</p>	<p>For participating landowners, the group program's rules provide that "All of a landowner's eligible parcels will be included in the group certification." Under statute, a parcel of land may not be classified under the program if a dwelling or other building is situated on the parcel. Also, a parcel of land may not be classified under the program if it is grazed by domestic animals or confined non-domesticated animals.</p>
<p><b>1.6.c.</b> The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.</p>	<p>NA</p>	<p>FME is a SLIMF.</p>
<p><b>FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying</b></p>	<p>C</p>	<p>DNR managers provided SCS with an updated group roster prior to the audit. Member details</p>



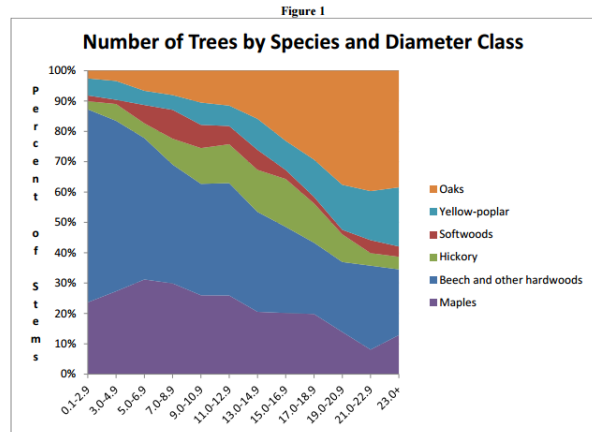
<p>Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next scheduled annual audit, or within one year of such change, whichever comes first.</p>		<p>are available to SCS via the INFRMS web database. Group membership <a href="#">summary data</a> is available on the Internet.</p>
<p><b>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established. (NE)</b></p>		
<p><b>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected. (NE)</b></p>		
<p><b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities. (NE)</b></p>		
<p><b>Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits. (NE)</b></p>		
<p><b>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b></p>		
<p><b>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b></p>	<p>C</p>	
<p><b>6.1.a</b> Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:  1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>;  2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities);  3) Other habitats and species of</p>	<p>C</p>	<p>Items 1-6 are included in the management plan template. Verified by reviewing management plans for properties visited during 2015 audit.</p>

<p>management concern;                  4) Water resources and associated riparian habitats and hydrologic functions;                  5) <b>Soil resources</b>; and                  6) <b>Historic conditions</b> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</p>		
<p><b>6.1.b</b> Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <b>best available information</b>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	C	<p>Pre-harvest inspections required by the Group’s forest management and COC procedures identify impacts and appropriate BMP measures, precautions for RTE species, affirmation of eligible FSC claims and codes, etc. To ensure the use of pre-harvest assessments, DNR now authorizes trained consulting foresters to complete the reviews in addition to DNR staff. The policy change significantly increases availability of trained foresters that can guide landowners. The first training session was completed in March 2015. Interviewed consulting foresters at 2015 site visits were knowledgeable and comfortable with the role. The visited timber harvests in 2015 that were marketed as certified had received pre-harvest reviews.</p>
<p><b>6.1.c</b> Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	C	<p>Inspections of harvest operations during 2015 audit indicated that impacts are being avoided or minimized. DNR district foresters and trained consulting foresters are involved in preparing project plans. Sampled harvests, tree planting, invasive species control, mine waste remediation and other practices demonstrated careful practices. The Classified Forest program includes an involuntary declassification procedure with a financial penalty as a deterrent to negative impacts.</p> <p>A sample of ICF properties are inspected each</p>

		<p>year for BMP compliance. A <a href="#">2014 summary</a> is available online:</p> <p style="text-align: center;"><b>Classified Forest &amp; Wildlands BMP Application</b></p> <table border="1"> <caption>Classified Forest &amp; Wildlands BMP Application Data</caption> <thead> <tr> <th>Category</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Meets Requirement</td> <td>85.62%</td> </tr> <tr> <td>Minor Departure</td> <td>12.30%</td> </tr> <tr> <td>Major Departure</td> <td>2.03%</td> </tr> <tr> <td>Gross Neglect</td> <td>0.06%</td> </tr> </tbody> </table> <p>Figure 1: Overall CFW BMP application percentages.</p>	Category	Percentage	Meets Requirement	85.62%	Minor Departure	12.30%	Major Departure	2.03%	Gross Neglect	0.06%
Category	Percentage											
Meets Requirement	85.62%											
Minor Departure	12.30%											
Major Departure	2.03%											
Gross Neglect	0.06%											
<p><b>6.1.d</b> On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>NA</p>	<p>No public lands within the group.</p>										
<p><b>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</b></p>	<p>NE</p>											
<p><b>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b></p>	<p>C</p>											
<p><b>6.3.a.1</b> The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth</p>	<p>C</p>	<p>Via tax incentives, the ICF encourages landowners to maintain land as forest. ICF contributes to moving forest to late successional because a significant percentage of group members do not harvest timber on their properties.</p>										

of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.

DNR uses a combination of continuous forest inventory (CFI) and Forest Inventory Analysis (FIA) data to evaluate forest age class distribution. 2014 data on tree sizes is represented in a recent [summary report](#):



DNR notes the non-uniform distribution of the number of stems by diameter class for different species (Figure 1). In this sample, all Oak species combined represented about 3.3% of all saplings 1 inch to less than 5 inches d.b.h. The lack of Oak seedlings/saplings and abundance of Maple seedlings/saplings suggests a future decline of Oak/Hickory forest types as mature stands senesce. By providing management planning assistance and referrals to consulting foresters for harvest assistance, the Classified Forest program helps to regenerate younger age classes.

**6.3.a.2** When a *rare ecological community* is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, *conservation zones* and/or *protected areas* are established where warranted.

C Rare ecological communities are identified through the Natural Heritage database. When rare communities are identified for a property, District Foresters will advise landowner to protect that community. Other rare community types, which are not rare enough to be tracked in Natural Heritage database, are identified by District Foresters during property inspections. Given that the majority of silviculture on ICF group members is single tree selection, it is unlikely that rare community types would be damaged by logging. Sensitive areas are buffered as noted in 2015 site notes.

<p><b>6.3.a.3</b> When they are present, management maintains the area, structure, composition, and processes of all <b>Type 1</b> and <b>Type 2 old growth</b>. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty</p>	<p>C</p>	<p>ICFCG tracts are assessed for the presence of HCVF, including old growth by District Foresters during regular tract inspections and other property visits. Candidate areas are submitted by the District Forester to the Group Manager who determines if further evaluation is needed. If further evaluation is warranted, the Group Manager will set up an assessment committee.</p> <p>Training for district and consulting foresters on HCVF topics including old growth occurred in 2013 and 2015.</p> <p>A listing of <a href="#">Indiana old-growth forest sites</a> is available on the DNR website.</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth stands are established.</li> <li>6. Landscape level considerations are addressed.</li> <li>7. Rare species are protected.</li> </ol>		
<p><b>6.3.b</b> To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>NA</p>	<p>Not applicable given the small size of CF properties.</p>
<p><b>6.3.c</b> Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ol style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> <li>d) habitat for plant species associated with riparian areas; and,</li> <li>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</li> </ol>	<p>C</p>	<p>RMZ are protected through implementation of Indiana BMPs. Audit team observed good conformance with RMZ protection during 2015 audit (e.g., Dubois Stop 1, Pike Stop 4).</p>
<p><b>Stand-scale Indicators</b>  <b>6.3.d</b> Management practices maintain or enhance plant species composition,</p>	<p>C</p>	<p>The individual tree and group selection silviculture practiced on ICF group members is generally consistent with maintaining plant</p>

<p>distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>		<p>species composition. ICF members manage for a diversity of species, and unique plant communities that are tracked in the Natural Heritage Inventory are protected (e.g., Spencer County Stop 1). Plantings tend to be favor species such as oak and walnut, which are otherwise decreasing due to maturing forests and natural conversion to more shade tolerant types. Management guidance provided to landowners also emphasizes control of invasive species such as ailanthus and Japanese stilt grass (see site notes).</p>
<p><b>6.3.e</b> When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <b>Native species</b> suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>Nearly all planting stock used by group members comes from the State of Indiana nurseries that use local seed of known provenance to grow <a href="#">native trees and shrubs</a>. The state nursery does sell Norway spruce, which is suggested as a windbreak tree rather than a forest planting.</p> <p>In 2014, DNR Forestry nurseries sold 2.6 million seedlings of 50-plus species to generate \$860,000 in revenue.</p> <p>In 2014, DNR began working with the American Chestnut Foundation to grow American Chestnut seedlings to help restore this threatened tree species. An ongoing relationship with the foundation and plans to grow the project are expected. Several thousand plants were produced in the project's first year.</p> <p>DNR Forestry partners with the Indiana Department of Corrections on nursery and seed collection labor to keep seedling prices low and make quality plants available to Indiana citizens. The working experience is helping provide these individuals with knowledge that may help them in the future (DNR 2014 Annual Report).</p>
<p><b>6.3.f</b> Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and</p>	<p>C</p>	<p>DNR updated the cull tree marking procedure and have provided relevant training to DNR and consulting foresters. The first training session</p>

<p>distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> <li>a) large live trees, live trees with decay or declining health, <i>snags</i>, and well-distributed coarse down and dead woody material. <i>Legacy trees</i> where present are not harvested; and</li> <li>b) vertical and horizontal complexity.</li> </ul> <p>Trees selected for <i>retention</i> are generally representative of the dominant species found on the site.</p>		<p>occurred in March 2015 and more are scheduled. DNR also provided a copy of an email sent to consulting foresters on Oct 21, 2015 the further clarifies the policy. During 2015 site visits, auditor observed appropriate retention of snags and culls. See DNR response to CAR 2014.3.</p>
<p><b>6.3.g.1</b> In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <i>even-aged systems</i> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>Green Tree Retention Policy (p. 16 of IFC Umbrella Plan). Regeneration harvests greater than 20 acres are very uncommon on ICF properties. No regeneration harvests of this size were visited during audit.</p>
<p><b>6.3.g.2</b> Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> <li>1. Is developed by qualified experts in</li> </ol>	<p>C</p>	<p>ICF has not had the need to justify a departure from opening size limits or green tree retention requirements.</p>



<p>ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</p> <ol style="list-style-type: none"> <li>2. Is based on the totality of the <b>best available information</b> including peer-reviewed science regarding natural disturbance regimes for the FMU.</li> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>		
<p><b>6.3.h</b> The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <b>invasive species</b>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</li> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. eradication or control of established invasive populations when feasible: and,</li> <li>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol>	<p>C</p>	<p>Interviews with ICF members, District Foresters, and consulting foresters showed a high level of awareness about invasive species. All management plans reviewed contained recommendation for treating invasive species, when they were present. Visited numerous properties where invasive species control projects were occurring (see site notes). Funding for invasive species control is available via Environmental Quality Incentive Program (EQIP), although many landowners are doing control work at their own expense. DNR partners with Purdue University and USDA on invasive species control <a href="#">strategies and publications</a>.</p> <p>The 2015 Indiana Forestry Strategic Plan includes objectives related to invasive species control.</p> <p>A conservative estimate by the Indiana Invasive Species Council (IISC) showed that property owners and taxpayers spent \$5.85 million in 2012</p>

		controlling invasive plants. State agencies spent about \$3 million controlling plant species (2014 DNR Annual Report).
<b>6.3.i</b> In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	The Division of Forestry, Fire Management Program provides organizational, operational and technical support regarding wildland and prescribed fire management. Indiana Code 14-23-5-1 outlines the Division of Forestry’s fire responsibilities. The Division of Forestry assumes Wildland fire responsibilities on ICF properties. The Division usually fulfills this responsibility through Cooperative Agreements with local fire departments to provide initial attack on wildland fires.
<b>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b>	NE	
<b>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b>	C	
<b>6.5.a</b> The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	<p>The Indiana DoF BMP manual serves this purpose. The Indiana Department of Environmental Management (IDEM) also enforces regulations related to surface waters.</p> <p>Classified Forest Act (IC 6-1.1-6) - Requires landowners to sustain the watershed protection, timber production benefits of forest land, and wildlife habitat. Failure to comply can force removal from the program and tax penalties.</p> <p>The Indiana Flood Control Act (IC 14-28-1) applies to all streams with a watershed greater than one square mile (640 acres) and prohibits the placement of tree tops in stream channels and</p>

		<p>their floodways which may unduly restrict its flood carrying capacity. Additional federal, state, and local regulations may also apply (e.g. Federal Emergency Management Agency flood areas, local ordinances requiring either logging permits or posting of road bonds). See <a href="#">Known Regulations</a> webpage.</p>
<p><b>6.5.b</b> Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	<p>C</p>	<p>All forestry operations in Indiana are held to BMP standards. Third-party audits are conducted annually of a sample of harvest sites to assess adherence to BMPs. BMP monitoring results are available <a href="#">online</a>.</p>
<p><b>6.5.c</b> Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> <li>• Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</li> <li>• Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</li> <li>• Rutting and compaction is minimized.</li> <li>• Soil erosion is not accelerated.</li> <li>• Burning is only done when consistent with natural disturbance regimes.</li> <li>• Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives.</li> <li>• Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will</li> </ul>	<p>C (OBS)</p>	<p>2014: Please see OBS 2015.1</p> <p>Indicator 6.5.c requires that “management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance.” The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18” in depth. This guideline may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting.</p> <p>DNR initiated a process to strength soil compaction and rutting guidelines, which are still in draft form. No related training has occurred.</p> <p>On one 2015 site, horses had been used to skid trees so as to prevent soil damage. None of the sites visited in 2015 exhibited ruts in excess of the proposed guidelines.</p>

<p>not be harmed.</p> <ul style="list-style-type: none"> <li>• Low impact equipment and technologies is used where appropriate.</li> </ul>		
<p><b>6.5.d</b> The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> <li>• access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts;</li> <li>• road density is minimized;</li> <li>• erosion is minimized;</li> <li>• sediment discharge to streams is minimized;</li> <li>• there is free upstream and downstream passage for aquatic organisms;</li> <li>• impacts of transportation systems on wildlife habitat and migration corridors are minimized;</li> <li>• area converted to roads, landings and skid trails is minimized;</li> <li>• habitat fragmentation is minimized;</li> <li>• unneeded roads are closed and rehabilitated.</li> </ul>	C	<p>Due to the small size of the majority of the properties enrolled in the certified group, most properties have very few permanent roads through the forestland. Road density is not an issue and temporary skid trails are usually put in for harvests. Water bars were noted on all skid trails at incline and excessive erosion was only noted in one case, where an internal CAR has been issued (Perry County Stop 2).</p>
<p><b>6.5.e.1</b> In consultation with appropriate expertise, the forest owner or manager implements written <b><i>Streamside Management Zone (SMZ) buffer</i></b> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water</p>	C	<p>Management practices in buffer zone areas adjacent to water resources are regulated in the Indiana BMP manual. Timber sale inspection reports for a couple 2015 site visits had required landowners to pull back tops that had fallen into stream channels, and the work was completed.</p>

<p>quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>		
<p><b>6.5.e.2</b> Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	<p>NA</p>	<p>No variations observed in field sites.</p>
<p><b>6.5.f</b> Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality,</p>	<p>C</p>	<p>BMPs require crossings to be rehabilitated and natural hydrology restored when removed. Several examples of temporary crossings were noted during site visits, all of which had been</p>

<p>hydrology, and fragmentation of <b>aquatic habitat</b>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>		<p>properly closed out.</p>
<p><b>6.5.g</b> Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>As all tracts in the certified group are privately owned, recreation is strictly controlled. No damage due to recreational use was noted during the audit. Although many landowners operate ATVs on their property, no excessive road or trail damage was observed.</p>
<p><b>6.5.h</b> Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>C</p>	<p>Grazing is not permitted on lands under the Classified Forest &amp; Wildlands Program. No unauthorized grazing was observed or reported by group members.</p>
<p><b>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>	<p>C</p>	
<p><b>6.6.a</b> No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>NC</p>	<p>The annual report from landowners indicated that one member in the certified group used prohibited chemicals within the last year on their individual property (diquat - CAS Registry Number 85-00-7). DNR district forester has interviewed the landowner and confirmed non-conforming use of a banned product, but DNR has not yet initiated an internal CAR per group procedures.</p>

<p><b>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</b></p>	<p>NE</p>	
<p><b>6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b></p>	<p>NE</p>	
<p><b>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	<p>NE</p>	
<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p>	<p>NE</p>	
<p><b>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>7.1. The management plan and supporting documents shall provide:</b>  <b>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b>  <b>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection.</b>  <b>e) Provisions for monitoring of forest growth and dynamics. f) Environmental</b></p>		

<p><b>safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</b></p> <p><b>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p> <p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p><b>7.1.a</b> The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	C	
<p><b>FF Indicator 7.1.a</b> A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <p>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan.</p> <p style="padding-left: 40px;">Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.</p> <p style="padding-left: 40px;">Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest is located; landscape-level considerations; past land uses of the</p>	C	<p>The following collection of documents comprise the Management Plan for IFG members:</p> <ul style="list-style-type: none"> <li>- Management Plan</li> <li>- Natural Heritage Database documentation</li> <li>- Archeological check documentation</li> <li>- Timber sale contracts</li> <li>- Annual Report for each property</li> <li>- Classified Forest and Wildlands Database (w/ Mapping System)</li> <li>- IFG Umbrella Plan</li> <li>- Classified Forest &amp; Wildlands Procedure Manual</li> <li>- Indiana Logging and Forestry Best Management Practices – 2005 BMP Field Guide.</li> </ul> <p>This collection of documents covers the requirements of 7.1.a.</p> <p>ICF has three main documents that make up the FMP, however, there are several supporting documents to the FMP available to group members in Indiana Department of Forestry publication and websites, such as the Indiana Forestry Exchange (<a href="http://www.in.gov/dnr/forestryexchange/default.aspx">http://www.in.gov/dnr/forestryexchange/default.aspx</a>).</p> <p>The three main FMP documents are: Classified Forest &amp; Wildlands Procedures Manual, dated</p>



<p>forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species</p>	<p>October 1, 2007 (CFWPM), which is a procedural manual for management of group members; Indiana Classified Forest Certified Group: UMBRELLA MANAGEMENT PLAN, dated November 2010 (UMP), which includes several items that demonstrate conformance to FSC requirements at the group level, and group member eligibility and division of responsibilities; and Stewardship Management Plan (SMP), which serves as the FMU-specific FMP for individual group members.</p> <p>i. Management objectives for the group level and group member level are contained in the introduction and Management Objectives section of the UMP (p. 11). This includes ecological, silvicultural (referred to as Desired Future Conditions), social, and economic objectives. Specific group member level objectives are included on the first page of each group member’s SMP, as well as the Area Description &amp; Management Recommendations section.</p> <p>ii. The UMP contains a description of the State of Indiana’s forest resources (p.p. 8-10), including historical and present day forest cover as a percentage of land cover type. Inventory data references the US Forest Service’s Forest Inventory and Analysis (FIA) data. Forest types classified by dominant species were determined through use of the FIA EVALIDATOR 4.0 tool and FIA data. The Property Overview and Area Description &amp; Management Recommendations sections of the SMP contain specific information on species and size/ age class at the stand level for each group member FMU.</p> <p>DNR reports that landowners usually list timber production and harvesting as a low priority. Therefore, the district foresters don’t emphasize inventories or other quantitative data collection unless the landowner expresses an interest in timber management.</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>	<p>DNR initiated a system wide continuous forest inventory (CFI) that will allow them to estimate growths and removals on a Classified Forest &amp; Wildland wide basis. They are just wrapping up the 4th year of CFI. Once this data is analyzed, DNR will have trend data specific to classified forests.</p> <p>iii. Typical silvicultural systems and their rationale are described in the UMP (p.p. 12-15). Special management considerations and other management considerations are also in the UMP (p.p. 14-16). Harvest systems are described in the Harvest Equipment section of the UMP (p.16). Landowners also typically receive practice plans (such as a timber sale plan, tree planting, mine reclamation plan, etc.) that detail specific activities.</p> <p>iv and vii. Species selection based on ecological guild (e.g., shade tolerance, conifer vs. hardwood) is covered in the UMP in both the Forest Types (p. 9) Forest Growth &amp; Dynamics Monitoring (p.p. 16-18) sections. ICF relies on FIA data to establish sustainable harvest rates and to monitor forest growth and dynamics. The volumes and growth rates are included on p. 9 for ICF as a whole. The Resource Description section of the SMP is where FMU-specific inventory information would be documented for individual group members.</p> <p>ICF supplements the FIA program with Continuous Forest Inventory (CFI). Five regions to sample on ICF group member FMUs have been selected. At the group member level, the establishment of an inventory system depends on the size of the tract and the intensity of management (p.p. 17-18 of UMP). Monitoring of growth on small tracts will be based on qualitative factors due to the light intensity of</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>management.</p> <p>Other monitoring protocols are described in the UMP, including: Monitoring of BMPs (p.21), Game Species (p. 24), and nongame species (p. 24), cultural resources (pests and invasive species (p.p. 27-29), IPM (p. 29), and use of non-native species (p.30)</p> <p>The CFWPM contains monitoring protocols for monitoring of group member FMUs.</p> <p>vi. At the group level, ICF uses the Indiana DNR, Division of Nature Preserves' Natural Heritage Data Center to assess for the presence of RTE species on group member FMUs (see p. 25 of UMP). In the SMP, RTE species and sensitive habitats would be described in the Sensitive Area/ Species Protection and Management section.</p> <p>viii. A map of the FMU is included as part of the SMP. Group members may also access mapping resources (e.g., NRCS soil mapper) via the Indiana Forestry Exchange Website. ICF also maintains several maps at the state, district, and FMU level that show water courses, land cover, roads, property boundaries, protected areas, etc.).</p> <p>Interviews with district foresters indicate that most Classified Forest parcels are relatively small and the tracts are treated as a block due to the continual selection marking technique commonly used in Indiana. As a result, stand maps and property boundary maps often coincide. Landowners with larger tracts typically hire a consulting forester to prepare forest management plans and harvests, and those consultant jobs generally have maps. Auditor interviews with landowners also indicate that many landowners keep detailed records including</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		maps of practices they implement. Although stand-level maps and data could be improved, the current approach is sufficient for the scale and intensity of the Classified Forest program.
<b>7.1.b</b> The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).		
<b>FF Indicator 7.1.b</b> Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.	C	During the 2015 site visits, nearly all the implemented practices observed by the auditor (harvests, TSI, invasive species control, etc.) were included in the forest management plans. In situations where the owner did something not in the plan (e.g., a diameter limit cut in Perry County), the owner had been sent a notice of nonconformity and corrective actions that are required.
<b>7.2</b> The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	NE	
<b>7.3</b> Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
<b>7.3.a</b> Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	The Division of Forestry has implemented a certification training program for professional foresters and industry. The training reviews Indiana Classified Forest Certified Group policies such as management plans, legacy trees, wildlife trees, BMPs, rutting guidelines, chemical use, shares sales, reporting and conducting a pre-harvest conference. The first training was held on March 24, 2015 and had 32 participants. Another training is scheduled for December 9, 2015.  Revision of DNR’s pre-harvest assessment to authorize trained consulting foresters to conduct

		the reviews is improving information sharing. Interviews with consulting foresters and loggers during 2015 site visits indicated that they had received copies of the parcels' plans.
<b>7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b>	NE	
<p><b>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b></p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<b>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b>	NE	
<b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</b>	C	
<b>8.2.a.1</b> For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	Section "Forest Growth & Dynamics Monitoring" in the group plan describes group manager and group member monitoring roles. In addition to FIA & CFI plot establishment and monitoring, DoF conducts regular BMP monitoring on 10% of reported harvest sites annually. All parcels in the Classified Forest & Wildlands Program are visited

		and reviewed every five years by a District Forester. Group members are responsible for informal, qualitative monitoring of forest conditions.
<b>8.2.a.2</b> Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	Monitoring of unanticipated loss occurs through: <ul style="list-style-type: none"> <li>• Indiana DoF Forest Health Surveys (aerial surveys)</li> <li>• Landowner identification resulting in visit from District Forester or consultant.</li> <li>• Forest inventory prior to and following harvest activities</li> <li>• Indiana Conservation Officers investigate cases of timber theft in which unsuspecting landowners are victimized by individuals whose business practices are dishonest or illegal.</li> </ul>
<b>8.2.b</b> The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	Annual reports collected by DoF from each landowner in the program collect harvest data, including number of trees harvested, bd ft volume, and species. Although landowners do not always provide the information, an adequate system is in place to monitor annual removals.  During 2015 site visits, interviews with two landowners indicated they keep very detailed records of costs and incomes to support cost sharing requests and for tax purposes.
<b>8.2.c</b> The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: <ol style="list-style-type: none"> <li>1) Rare, threatened and endangered species and/or their <i>habitats</i>;</li> <li>2) Common and rare plant communities and/or habitat;</li> <li>3) Location, presence and abundance of invasive species;</li> <li>4) Condition of protected areas, set-asides and buffer zones;</li> <li>5) High Conservation Value Forests (see Criterion 9.4).</li> </ol>	C	<ul style="list-style-type: none"> <li>• DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels.</li> <li>• The location and status of invasive species is routinely monitored by field foresters.</li> <li>• DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides.</li> </ul>
<b>8.2.d.1</b> Monitoring is conducted to ensure that site specific plans and operations are	C	Such monitoring occurs and is described in the DoF Classified Forest & Wildlands Procedures

<p>properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>		<p>Manual and the Group Umbrella Plan. A sample of 10% of harvest sites are monitored for BMP impacts annually. All harvest sites are subject to close-out inspections.</p>
<p><b>8.2.d.2</b> A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>Such monitoring occurs and is described in the DoF Classified Forest &amp; Wildlands Procedure Manual and the Group Umbrella Plan. All harvest sites are subject to close-out inspections.</p>
<p><b>8.2.d.3</b> The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>	<p>C</p>	<p>Addressed in the Indiana <a href="#">Statewide Forest Assessment &amp; Strategy</a>.</p> <p>The 2015 DNR <a href="#">Forestry Strategic Plan</a> addresses these requirements.</p>
<p><b>8.2.d.4</b> Stakeholder responses to management activities are monitored and recorded as necessary.</p>	<p>NA</p>	<p>See Family Forest applicability note and DoF determination of NA.</p>
<p><b>8.2.d.5</b> Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).</p>	<p>C</p>	<p>The Division of Forestry has an archeologist who screens about 150 data requests per year for active management proposals on Classified Forests. DoF partners with the DNR Division of Historic Preservation and Archeology in outreach to tribal representatives.</p>
<p><b>8.2.e</b> The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	<p>C</p>	<p>Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Land owners use simple cost-benefit calculations to determine efficiency of their overall management choices (i.e., enroll in Classified Forests and manage for timber products).</p> <p>Since DNR is a public agency, its budget and services receive close scrutiny by the state legislature and executive branch. The 2015 Forestry Strategic Plan assesses DoF costs and revenues related to the Classified Forest Program.</p>

		Landowners who receive EQIP cost sharing are subject to USDA audits (see 2015 site note for Pike County Stop 1).
<b>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b>		
<b>8.3.a</b> When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See Report Appendix 6 – Chain of Custody Indicators for FMEs.
<b>8.3.b</b> The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See Report Appendix 6 – Chain of Custody Indicators for FMEs.
<b>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b>	NE	
<b>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b>	C	
<b>8.5.a</b> While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	<p>A 2014 Program Summary has been developed and posted to the <a href="#">DoF website</a>. In regards to volume and growth data, <i>IN DNR Classified Forest Report of Continuous Forest Inventory (CFI) Summary of Years 2011-2014</i> is posted at <a href="http://www.in.gov/dnr/forestry/files/fo-Classified Forests CFI Report 2011 2014.pdf">http://www.in.gov/dnr/forestry/files/fo-Classified Forests CFI Report 2011 2014.pdf</a></p> <p>As of Oct 29, 2015, the auditor observed that current volume, BMP compliance and other summary data for the Classified Forest program</p>



		are available on the organization’s website. Many useful updates were prepared in conjunction with the 2015 Forestry Strategic Plan.
<p><b>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <ul style="list-style-type: none"> <li><b>a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance</b></li> <li><b>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</b></li> <li><b>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</b></li> <li><b>d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).</b></li> </ul>		
<b>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</b>	C	
<p><b>9.1.a</b> The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	NC	In preparation for past audits, DoF has conducted components of their HCVF evaluation which has resulted in a general list of the HCVF categories determined to be present, a combined acreage of these areas, and a list of community types that could be designated as HCVF if found in the field. However, a full HCVF assessment has not yet been completed as described in Appendix F. Although DNR has the components of a Classified Forests HCVF assessment, they have not pulled them together into a report per FSC-US guidance.
<b>9.1.b</b> In developing the assessment, the forest owner or manager consults with	C	

qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.		
<b>FF Indicator 9.1.b</b> In developing the assessment, the forest owner or manager consults with databases, qualified experts, and/or best available research and literature.	C	In developing the HCVF assessment thus far, DoF conducted several GIS analyses, consulted the state natural heritage database for S1 and S2 communities.
<b>9.1.c</b> A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	A summary of ecological communities or habitat types identified as HCVF, as well as a process for identifying HCVF as land is added to the certified group, is described in the Umbrella Plan, p.36.
<b>9.2</b> The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	NE	
<b>9.3</b> The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	NE	
<b>9.4</b> Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	NE	
<b>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</b>		
<b>10.1</b> The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.	NA	SCS has determined that FSC P10 does not apply since the Indiana Classified Forest Program employs only natural forest techniques.

## Appendix 6 – Chain of Custody Indicators for FMEs


SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 5-1: 12/03/12

REQUIREMENT	C/ NC	COMMENT/CAR
<b>1. Quality Management</b>		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.	C	Brenda Huter, Forest Stewardship Coordinator, is identified in this role.
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products” requires retention of records for five or more years.
1.3 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i>	C	<p><input checked="" type="checkbox"/> <b>Stump</b> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p> <p><input type="checkbox"/> <b>On-site concentration yard</b> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><input checked="" type="checkbox"/> <b>Off-site Mill/Log Yard</b> <i>Transfer of ownership occurs when certified-product is unloaded at purchaser’s facility.</i></p> <p><input type="checkbox"/> <b>Auction house/ Brokerage</b> <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><input checked="" type="checkbox"/> <b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b> <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p> <p><input checked="" type="checkbox"/> <b>Log landing</b> <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> <b>Other</b> <i>(Please describe):</i></p>


<p>1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.</p>
<p>1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.</p>
<p><b>2. Product Control, Sales and Delivery</b></p>		
<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>The FSC claim and certificate code is verified in a pre-harvest inspection form and is included in timber sale documents. Recent procedural changes now allow trained consulting foresters and DNR foresters to complete the pre-harvest inspections.</p>
<p>2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).</p>	<p>C</p>	<p>Each group member must report the volume of timber sold on an annual report.</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> <li>a) name and contact details of the organization;</li> <li>b) name and address of the customer;</li> <li>c) date when the document was issued;</li> <li>d) description of the product;</li> <li>e) quantity of the products sold;</li> <li>f) the organization’s FSC Forest Management (FM/COC) or FSC</li> </ul>	<p>C</p>	<p>Addressed in Group Umbrella Plan. Auditor reviewed pre-harvest assessment forms and timber sale contracts at two active sales (David Seng, Dubois County; Gary Hall, Pike County), which included the required elements.</p>

<p>Controlled Wood (CW/FM) code;</p> <p>g) clear indication of the FSC claim for each product item or the total products as follows:</p> <ul style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups;</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ul> <p>h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.</p>		
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.</p> <p><b>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</b></p>	C	<p>Haul tickets used by COC certified primary producers include information about whether the logs are from a certified Classified Forest tract.</p>
<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information).</p>	NA	<p>No space constraints.</p>

<p>This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> <li>a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document;</li> <li>b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence;</li> <li>c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence.</li> </ul> <p><i>FSC-ADVISE-40-004-05</i></p>		
<p><b>3. Labeling and Promotion</b></p>		<input type="checkbox"/> n/a
<p>3.1 Describe where/how the organization uses the SCS and FSC trademarks for promotion.</p>	<p>C</p>	<p>The Group Manager uses FSC trademarks on public Internet pages and in educational publications and news releases.</p>
<p>3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.</p>	<p>C</p>	<p>The Certification Coordinator provided a log (below) of trademark use authorizations from SCS.</p> <p>The auditor sampled web pages using FSC trademarks and observed an FSC license code or other elements of an FSC promotional panel. Trademark registration symbols were used as required.</p>



Setting the standard for sustainability.™

[LOGOUT](#)  
 Indiana Division of Forestry - CFM  
 FSC Certification# SCS-COC-00123N  
 Language: English  [\[Change\]](#)

[Home](#) • [Ask SCS a Question](#) • [Document Library](#) • [Trademark News](#)

### My Approval Request History

SCS-COC-00123N - Indiana Division of Forestry - CFM Associate:

Case#	Created By	Submitted Date	Status	Request Type	Job#	Job Name	Site Name	Approver
142389		10/16/2015	Approved	Off-Product		2014 CFW Annual Report	Central Office	Tessie Barger
141506		09/29/2015	Approved	Off-Product		WOW article		Gabriela Chavez
133780		04/14/2015	Approved	Off-Product		CFW E-newsletter	Central Office	Jillian Van Luchem
132701		03/23/2015	Approved	Off-Product		Certification Update Powerpoint	Central Office	Michelle Tuyen
132427		03/17/2015	Approved	Off-Product		CFW Newsletter	Central Office	Jillian Van Luchem
131797		03/03/2015	Approved	Off-Product		Shares Sales Policy Notice	Central Office	Michelle Tuyen
127685		12/02/2014	Approved	Off-Product		CFW Annual Report	Central Office	Jillian Van Luchem
127080		11/18/2014	Approved	Off-Product		Certification Stewardship Note		Michelle Tuyen
127077		11/18/2014	Approved	Off-Product		Private Forestlands Certification webpage	Central Office	Michelle Tuyen

<p>3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.</p>	C	<p>As described above.</p>
<p><b>4. Outsourcing</b> <span style="float: right;"><input type="checkbox"/> n/a</span></p>		
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>	C	<p>Timber from ICFCG lands sold on shares cannot be passed down the chain of custody unless the shares sale logger/consultant (outsourcing contractor) is FSC Chain of Custody certified. In Indiana, these are primary producers in the Indiana COC Group SCS-COC-002041, listed individually at <a href="http://info.fsc.org">info.fsc.org</a>.</p>
<p>4.2 The FME shall have a control system for the outsourced process which ensures that:</p> <ul style="list-style-type: none"> <li>a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership;</li> <li>b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement;</li> <li>c) The FME issues the final invoice for the processed or produced FSC-certified material</li> </ul>	C	<p>As noted above, landowners are required to work with COC certified loggers in order to make FSC claims.</p>

<p>following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.</p>		
<p><b>5. Training and/or Communication Strategies</b></p>		
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office.</p> <p>Qualified loggers providing outsourcing services have been trained in COC procedures as members of the Indiana COC Group SCS-COC-002041.</p>
<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office.</p>

**Appendix 7 – Group Management Program Members**

All group members’ identification and property information is tracked in INFRMS, the DoF database system. As SLIMF group members, identifying information at the property level is confidential, but a full list of all participating group members is maintained in INFRMS. See next page for a snapshot of Classified Forest enrollment by county. Classified Forest & Wildlands owners with at least ten acres of woodlands in a classified parcel may choose to belong to the Classified Forest Certified Group. As of October 2014, there were 528,693 acres in 10,418 parcels in the Classified Forest Certified Group (FSC-C071226).





# INDIANA CLASSIFIED FOREST & WILDLANDS 2014 PROGRAM SUMMARY

## Program Enrollment\*

**Total Enrolled Acres: 746,357**  
**Total Number of Parcels: 15,463**

COUNTY	ACRES	PARCELS	COUNTY	ACRES	PARCELS	COUNTY	ACRES	PARCELS
ADAMS	1,639	67	HENDRICKS	1,806	49	PIKE	10,915	161
ALLEN	2,573	99	HENRY	2,321	111	PORTER	5,239	151
BARTHOLOMEW	4,233	101	HOWARD	922	40	POSEY	7,407	141
BENTON	287	6	HUNTINGTON	3,471	131	PULASKI	1,521	43
BLACKFORD	1,070	43	JACKSON	12,599	206	PUTNAM	18,220	324
BOONE	1,848	50	JASPER	2,573	38	RANDOLPH	2,610	97
BROWN	23,091	400	JAY	3,405	137	RIPLEY	10,357	283
CARROLL	3,314	102	JEFFERSON	15,494	258	RUSH	2,061	66
CASS	4,223	136	JENNINGS	16,110	318	SCOTT	5,993	154
CLARK	7,050	93	JOHNSON	1,973	50	SHELBY	1,010	31
CLAY	7,523	175	KNOX	5,012	106	SPENCER	14,603	343
CLINTON	631	27	KOSCIUSKO	11,568	315	ST. JOSEPH	7,629	302
CRAWFORD	24,815	357	LAGRANGE	1,837	53	STARKE	5,980	131
DAVISS	3,870	77	LAKE	2,239	82	STEUBEN	3,639	84
DEARBORN	6,402	144	LAPORTE	9,367	210	SULLIVAN	11,670	198
DECATUR	3,942	119	LAWRENCE	21,812	293	SWITZERLAND	7,591	136
DEKALB	4,510	149	MADISON	1,092	44	TIPPECANOE	2,218	50
DELAWARE	3,003	104	MARION	797	37	TIPTON	400	15
DUBOIS	19,177	406	MARSHALL	10,940	333	UNION	3,078	67
ELKHART	4,603	158	MARTIN	20,807	269	VANDER-	1,427	47
FAYETTE	7,201	164	MIAMI	4,110	139	VERMILLION	8,812	128
FLOYD	3,965	92	MONROE	21,706	372	VIGO	9,546	162
FOUNTAIN	6,503	128	MONTGOMERY	4,369	103	WABASH	4,383	143
FRANKLIN	15,003	244	MORGAN	11,142	202	WARREN	3,794	61
FULTON	4,551	139	NEWTON	841	14	WARRICK	14,832	320
GIBSON	11,372	207	NOBLE	6,367	204	WASHINGTON	20,905	287
GRANT	1,805	73	OHIO	2,763	36	WAYNE	9,081	273
GREENE	25,892	355	ORANGE	23,688	379	WELLS	2,114	77
HAMILTON	1,258	58	OWEN	30,036	524	WHITE	1,129	28
HANCOCK	890	37	PARKE	28,480	374	WHITLEY	3,127	104
HARRISON	31,805	433	PERRY	27,367	509	<b>TOTAL:</b>	<b>746,357</b>	<b>15,463</b>

\*Enrollment as of December 31, 2014

## Appendix 8 – Group Management Programs

SCS audits Group entities and group members to the FSC Group Management Standard with the same frequency. All Principles in the FSC Forest Management Standard are evaluated – during the full evaluation or reevaluation audit and once again over the course of validity of the certificate during annual surveillance audits. SCS will also audit group clients to the Group Management Standard if there have been substantial changes to group management or the scope of the certificate during the previous year, such as a large change in the number of group members or changes to the policies of administering the group.

Group Management Conformance Table

Requirement	C/NC	Comment / CAR
<b>PART 1 QUALITY SYSTEM REQUIREMENTS</b>		
<b>C1 General Requirements</b>	C	
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	The independent legal entity is the State of Indiana. See p.p. 1-3 of ICFCG Umbrella Plan for the full history of state laws that establish the State of Indiana’s Division of Forestry as the manager of the group program with technical assistance provided by the Division of Fish & Wildlife.
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	C	The group entity, Indiana Division of Forestry Classified Forest & Wildlands Program (ICF), is responsible for paying fees to the certification body (CB) and AAF to FSC through the CB. ICF is up-to-date on payments to the CB.
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	C	This statement is clearly provided on p.1 of the Umbrella Management Plan.
1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	C	DNR’s increased focus on FSC-related training is documented in publications, 2015 Strategic Plan material, and the agendas for completed and planned training events (see response to CAR 2014.15). District and consulting forester awareness of these issues was good during 2015 field interviews.
<b>C2 Responsibilities</b>	C	
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing,	C	The responsibilities of all parties noted on the Group Org chart, including additional involved parties such as group members, professional foresters, wildlife biologists and other relevant forestry professionals, are listed beginning on p.4 of the Umbrella Plan.

timber sale, etc).  <i>NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group members in order to take into account of a landscape approach.</i>		
2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity’s compliance with all applicable requirements of this standard.	C	This position is noted on the Org Chart and is currently held by Brenda Huter.
2.3 Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.	C	ICF provides a list of training opportunities for ICF staff, group members, and private forestry professionals.  District newsletters are developed by District Foresters- informational brochures, e.g., controlling invasive species, are often sent by District Foresters along with Management Plan, to ensure group members are knowledgeable about related FSC requirements.
<b>C3 Group entity’s procedures</b>	C	
3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including:	C	
I. Organizational structure;	C	p.3 of the Umbrella Plan
II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc);	C	p.4 of the Umbrella Plan
III. Rules regarding eligibility for membership to the Group;	C	Eligibility is explained in the Umbrella plan and includes eligibility under the Classified Forest and Wildlands Program.
IV. Rules regarding withdrawal / suspension of members from the Group;	C	Voluntary withdrawal and mandatory withdrawal are described on p.7 of the Umbrella Plan.

V.	Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with;	C (OBS)	The issuance of corrective actions and the decisions to create timelines to fulfill them are described beginning on p.7 of the Umbrella Plan. The Guidance table provides further description of how to issue corrective actions for specific nonconformities. See OBS 2015.4 regarding an opportunity to improve tracking of internal CARs.
VI.	Documented procedures for the inclusion of new Group members;	C	This is included in the <i>Group Enrollment</i> section of the Umbrella Plan (p. 5).
VII.	Complaints procedure for Group members.	C	Complaint procedure is in Umbrella Plan.
3.2	The Group entity's procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.	C	ICF's group management planning documents and procedures and the underlying State of Indiana laws that establish the ICF program provide a framework for an efficient internal control system ensuring that all members are fulfilling applicable requirements.
3.3	The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.	C	The Umbrella Plan assigns responsibility for group management procedures to ICF staff positions located at the state and district levels.
3.4	The Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformances with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group. <i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i>	C	ICF has established a robust internal evaluation system for the group program. Umbrella Plan describes procedures for initial inspection and re-inspection of group member forestlands. In the Umbrella Plan, it is the District Forester's responsibility to inspect all certified group members at 5 year intervals and may conduct site visits during environmental impact assessments or active timber sales. Eligibility to join the Classified Forest & Wildlands Program and the FSC group certificate is determined during initial field visits.
<b>C4 Informed consent of Group members</b>		NE	
<b>C5 Group Records</b>		NE	
<b>PART 2 GROUP FEATURES</b>			
<b>C6 Group Size</b>		NE	
<b>C7 Multinational groups</b>		NE	
<b>PART 3 INTERNAL MONITORING</b>			
<b>C8 Monitoring requirements</b>		NE	
<b>C9 Sales of forest products and use of the FSC trademark</b>		C	
9.1	The Group entity shall document and implement a system for tracking and tracing of forest products produced by the Group	C	ICF has documented the system for Marketing of Forest Products in the Umbrella Plan.

members which are supposed to be sold as FSC certified.		
9.2 For the purpose of ensuring that non certified material is not being mixed with FSC certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group entity.	C	The sales protocol described in the Umbrella Plan requires that certified material remain physically separate from non-certified material. Auditor viewed conformance with this in Districts 11 & 16 during 2015 site visits (Seng and Hall harvests).
9.3 The Group entity shall ensure that all invoices for sales of FSC certified material are issued with the required information (see FSC-STD-40-004 V2-0 Clause 6.1.1) and are filed by the group members.	C	The sales protocol described in the Umbrella Plan covers the required information in FSC-STD-40-004 V2-0 Clause 6.1.1. Documentation and implementation required to demonstrate conformance to SCS FSC Chain of Custody Indicators for Forest Management Enterprises (above) fulfills the requirements of indicator 9.3.
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	Documentation and implementation required to demonstrate conformance to SCS FSC Chain of Custody Indicators for Forest Management Enterprises (above) fulfills the requirements of indicator 9.4.